Student Protection Plan – Annex D

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Student Protection Plan: from January 2025 for the duration of the probationary DAPs period

Introduction

The Student Protection Plan (SPP) outlines the actions the Engineering College of Technology (ECT) will take to minimise the impact of risks to students enrolled to study at ECT. The plan includes examples of events which may trigger action by the ECT and expose students to risk, such as the failure to maintain DAPs during the initial three-year probationary DAPs and the subsequent period, if the probationary DAPs is extended, as well as the closure of a course or campus, a location change, the discontinuation of a discipline, or a market-driven exit.

Further risks include ECT ceasing to operate as a higher education provider, material changes to the programmes or the deterioration of the quality of programmes and services provided to students, and other risk factors that are described in this plan. The SPP describes the most critical risks to students, the level of the risks, and the measures that will be taken to mitigate them.

Organisational context
ECT's key objective is to provide outstanding practical engineering and technology education at the

Bachelor and Master levels, in a growing array of engineering fields. ECT is registered to offer first degree level higher education (SIC 85421) and post-graduate level higher education (SIC 85422) in the UK. In November 2021 ECT was included in the UK Register of Learning Providers (UKPRN 10089771).

Although ECT is a newly established higher education provider in the UK, it is closely linked (with the same ownership) to its Australian-based sister organisation, the Engineering Institute of Technology (EIT). EIT has been providing accredited diplomas and degrees to students in over 160 countries for fifteen years. Currently EIT has approximately three thousand students, based globally (including the UK), and enrolled in both on-campus and online programmes in the fields of engineering and technology.

Many of EIT's diplomas and degrees are recognised by engineering professional bodies around the world, and under the internationally recognised Dublin Accord (for advanced diplomas), Sydney Accord
(for bachelor's degrees) and Washington Accord (for master's degrees). EIT is registered by the Australian Government's Tertiary Education Quality and Standards Agency (TEQSA) as a Higher Education Provider (https://www.teqsa.gov.au/provider/engineering-institute-technology-pty-ltd) and the Australia Skills Quality Authority (ASQA) as a Registered Training Provider (RTO) (https://training.gov.au/Organisation/Details/51971).

EIT's financial records show that the college is in a sound financial position with no borrowings. Since its inception in 2008 this has been confirmed annually by an independent financial audit. Furthermore, in TEQSA's annual Provider Risk assessment reports, EIT is rated low-risk on its financial position.
These evaluations confirm that EIT is a financially secure business with sizeable reserves.

EIT is legally bound to ensure that ECT remains financially sustainable and has signed a Guarantee to this effect.

During the first year of operations in the UK, ECT will have access to support from EIT. These will be in line with the best practices established through EIT's 30 years of operation, adapted to the UK Higher Education context, and will include the use of EIT's pioneering online technologies.

The specialised staff play a key role in the design and planning phase of ECT's operations in the UK and during the enrolment of the first student cohorts. EIT staff will also guide and mentor the ECT managers who will be appointed after the DAPs order is granted. It is anticipated that within six months, ECT will be operating independently with occasional support from EIT and within a year of the granting of the DAPs order will be totally independent.

ECT programmes, student enrolment and lecturers

The following four taught engineering degrees will be offered in the United Kingdom:

- Bachelor of Engineering (Honours) Electrical Engineering (BEE)
- Bachelor of Engineering (Honours) Industrial Automation Engineering (BIA)
- Master of Science (Industrial Automation and Instrumentation Control) (MIA)
- Master of Science (Power System Analysis and Renewable Integration) (MEE).

The main target group will be mature-age students based in the UK and globally and who are working in industry. Therefore, they will generally prefer to study part-time while continuing with their work commitments. ECT plans to enrol a small number of students in the first five years, increasing from the initial 10 to 15 students in each bachelor's degree and increasing from 7 to 11 students in each master's degree. The small number of students that will be recruited and will – by and large – study part-time. The risks for students, described in the SPP, must be considered in the context of the online delivery of ECT programmes to this student group.

There will be four lecturers allocated to each degree for the first cohort of students The highest staff student ratio will be 1:18. The forecast for student numbers in the first year of DAPs is 20 for each bachelor's degree, increasing to a total of 73 students by the third year, with the staff-student ratio as 1:5 in Year 1 and 1:18 by Year 3. The forecast for student numbers in the first year of the master's degree is 14, increasing to a total of 52 by the third year, with the staff-student ratio as 1:4 in Year 1 and 1:13 in Year 3. The staff-student ratio will be reviewed annually; additional lecturers will be recruited when necessary to keep the ratios as outlined above.

The proposed four degrees will be delivered fully online, with industry-experienced and industry-based expert lecturers presenting scheduled classes via live, interactive webinars and video-conferencing. State-of-the art educational technologies - synchronous, real-time online learning with elements of asynchronous tuition – will combine with the practical application of learning, using remote labs (linked to real equipment), virtual labs and simulation software. Students will also be required to complete practical workshops and prescribed industrial experience at their place of employment or at a workplace. ECT will assist students with these arrangements; and also make the practical workshops available at the ECT offices typically twice a year.

Identifying potential risks to students

ECT's *Risk Management Policy* describes the structured quantitative approach process for managing risks, which involves:

- Establishing the context
- Identifying the risks
- Analysing the risks
- Evaluating the risks
- Treating the risks (i.e. responding to the risks, including assigning responsibility for risk to the appropriate ECT unit)
- Monitoring and review
- Communicating and consulting.
- The following are the main areas of risk described in the SPP that could impact the students' ability to successfully complete the programmes offered by ECT:
- Organisational
- Financial
- Information Technology and online programme delivery
- Academic and support staff
- The quality of the student learning experience
- Major programme change
- Programme discontinuation
- Termination of ECT's partnership with EIT
- De-registration by the OfS
- Failure to maintain DAPs powers through and beyond the probationary period
- Disruption by external factors.

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

In this section the risks which could undermine the continuation of ECT's students' studies are identified, the impact of these risks on the students, and the likelihood of these risks materialising. Risk is adjudged by multiplying likelihood by impact in the discussions below. The next section outlines how students will be protected in the (unlikely) event of any of these risks materialising. The risks to the continuation of studies will similarly apply to everyone in the student group. As mature-age students studying part-time while working, their needs, characteristics and circumstances will be very similar, even though their ages, work experience and employment context may differ.

1.1 Organisational risks

The impact would be very high, but the likelihood is low and thus the risk is low. The likelihood that ECT will fail as a higher education provider, during the first three years of operation, is most unlikely. ECT has been built - and customised for the UK HE context - on the business model that has enabled its sister organisation, the Engineering Institute of Technology (EIT), to achieve and sustain international success. For 15 years, globally-based students have graduated from, and continue to study, accredited engineering diplomas and degrees at EIT. These qualifications have Australian

Government accreditation and have been recognised in the UK for over a decade through the International Engineering Alliance and the Engineering Accords (https://www.ieagreements.org/). The need for engineering degrees offered online in the UK has been confirmed through EIT's engagement with UK-based companies and students. The students (and their employers) have selected EIT's Australian-accredited engineering online degrees for ten years (and diplomas for fifteen years).

ECT will work innovatively to be a leader among the UK-based engineering institutions. It will offer education via an engaging platform of distance learning to UK students, and to those from other countries wishing to graduate with a UK degree.

In the medium term, universities and colleges will emerge as competition, e.g. in relation to staffing, financial health and student numbers. In the positive spirit of competition, however, ECT will seek to attract outstanding staff, the highest quality students, and the attention and support of benefactors, businesses and governments. Furthermore, ECT, through its relationship with EIT, has a competitive advantage: extensive experience in the online delivery of high-quality accredited engineering degrees (in the UK and in over 160 countries), while other colleges and universities returned to face-to-face delivery after the COVID-19 pandemic.

The loss of independent Board of Governors members and the inability to attract new members poses a low likelihood with medium impact. Conflicts and serious conflicts/disagreements between the Board and management poses a medium likelihood with a medium impact.

Negative reports from external agencies on the effectiveness of ECT as an education provider poses a high risk to the institution. An increase in negative publicity and complaints, such as harmful comments on social media platforms, although unlikely, will have a medium impact on the organisation and will need to be managed professionally and efficiently.

Code of conduct and ethics transgressions, academic misconduct and the non-adherence to prescripts in policies and procedures - by students and staff - pose a medium risk, but low impact to the effective operations of the institution.

ECT will employ tried and tested approaches to minimise the impact of these breaches; by engaging actively with students and confronting issues expeditiously; and the rigorous implementation of the *Academic Honesty and Misconduct Policy and Procedures*.

ECT manages such events in line with its Force Majeure provisions (as set out in the Academic Regulations and associated policies), which establish the approach to unavoidable disruption, communication with students and the continuation of study where reasonably practicable.

1.2 Financial risks

The financial health of ECT is anticipated to be robust. It will have the support of EIT which has a solid financial track record. Therefore, although the impact would be high, the likelihood is low with a resultant low risk. Solid financial health is necessary in order to provide overall support to ECT during the first five years of operation, in particular for staffing, learning resources and IT infrastructure.

To achieve a sustainable operation and the necessary investment to fulfil its mission, ECT would seek to achieve an annual operating surplus (net profit before tax) of 20%. If the revenue falls below 10% and if cash reserves fall below 30% of revenue, the impact could be significant, but the likelihood is low.

There is a low likelihood of risk in the operation resulting from fraud and financial mismanagement, and from the loss of intellectual property due to staff non-adherence to non-disclosure agreements. Other financial factors that pose little threat, based on EIT's historical record of success, include the failure to enrol sufficient students to ensure financial sustainability and the failure to refund enrolled students who wish to withdraw. They would have a medium impact on the organisation.

Overall, there is a low likelihood of any financial impact on ECT over the short term, primarily due to the undertaking by EIT to cover ECT's liabilities to a maximum of £1 million for a period of 5 years (refer to the EIT-ECT Deed of Undertaking.

It is anticipated that within six months, ECT will be operating with increasing operational independence, with occasional support from EIT. Within one year of the granting of the DAPs order, ECT is expected to operate independently on an operational basis. This operational independence does not affect the financial support arrangements set out in the EIT-ECT Deed of Undertaking, under which EIT has committed to supporting ECT's financial sustainability for a defined period.

1.3 Information Technology and online programme delivery

ECT's IT infrastructure (including communications) is a key operational asset and essential for the delivery of programmes through the online delivery model, as well as for the day-to-day operations.

The robust online programme delivery model ensures that learning sessions, learning resources and student support are readily available and do not rely upon traditional "bricks and mortar" infrastructure continuity. The disruption to learning and teaching associated with physical facilities is, therefore, deemed low risk. If there is a potential or real risk to the physical premises, ECT can relocate with little interruption or indeed risk to the students' learning and to business operations.

However, there is also a low likelihood and high impact (with low risk) in the following specific circumstances:

- A prolonged outage of the IT infrastructure which is essential for learning and teaching: the impact on students will depend on its duration, with the impact increasing the longer the disruption continues
- Inadequate disaster recovery plans for digital resources
- Information security failing and involving personal data
- These risks are mitigated through ECT's IT Acceptable Use Policy, Data Protection Policy and Procedures, and internal cybersecurity and infrastructure management processes.
- Hackers gaining access to ECT's database and other electronic data and/or communication
- Threats from malware and viruses
- Failures and/or obstacles to students' access to the remote and virtual labs for compulsory exercises
- Service delivery failures, e.g. inadequate student records and payment malfunctions
- Failure of ECT to invest sufficiently in the ongoing maintenance and upgrading of ECT infrastructure leading to a decay of this critical business element.

ECT has effective and strict policies and procedures to deal with the issues outlined above. In particular, real-time monitoring of all IT networks for cyberattacks and performance will be undertaken; this will ameliorate the technology risks outlined above.

1.4 Academic and support staff

Staffing is one of the risks faced by providers offering programmes in specialised fields such as engineering, especially at a professional level. Salaries for academics are relatively low when compared with business and industry. ECT will draw on the expertise in industry to ensure the content and delivery is relevant and practical. The difficulty of recruiting ideal candidates poses a **high risk** to the quality of programme delivery and the reputation of the institution, but with **low likelihood** and **medium impact** as it will be for a small number of staff at any one time.

Staffing generally, however, poses a **low risk** to the continuity of student studies. ECT will have access to a wide range of highly qualified academic, managerial, support and specialised staff, as well as support from the EIT academic staff community, to ensure a quality learning experience. Furthermore, the online delivery to part-time students makes it possible for ECT to attract industry

professionals or those who lecture at other higher education institutions. The unanticipated departure of key members of academic staff may have a **medium impact**, but overall is deemed **low risk**.

1.5 The quality of the student learning experience

The **likelihood is adjudged low** with **medium impact** from a poor-quality student experience which may impede the continuity of ECT operations, for example under circumstances where:

- The quality of provision of programmes/modules falls below expectations
- The learning resources lack relevance to the changing world of work
- The quality of student support/pastoral care becomes inadequate
- Student expectations are unmanaged in response to education cost increases
- Student assessment submission rates and/or success rates are low
- Student participation in scheduled learning activities is low
- Student experiences are unsatisfactory and lead to reputational damage in relation to national and international competitors
- ECT graduates lack career opportunities (an unlikely scenario given the world-wide need for qualified engineers)
- There is a loss of qualified and experienced academic and other staff.

There is a medium risk that students whose first language is not English, those from Black, Asian or other minoritised ethnic backgrounds, disadvantaged backgrounds and persons with disabilities, etc. could face challenges which negatively impact the quality of their learning experiences. ECT is committed to widening access to these groups, as well as other under-represented groups in the engineering sector, such as women. ECT will provide additional support to address the diverse needs of its students.

ECT will provide additional support to address the diverse needs of its students as stipulated in the Student Support Policy and Procedures, which includes language assistance for students for whom English is not their first/native language; support in mastering the mathematical components of the modules; individual tutoring; support and guidanceby trained ECT staff to deal with personal and social issues, or referrals to external professionals for counselling, medical and health issues and welfare services.

There are a range of policies and procedures that are actively applied to address and mitigate these risks. These include the Student Support Policy and Procedures, Assessment Feedback Policy, Students of Risk of Academic Failure Policy and Procedures and Student Complaints and Academic Appeals policies. Together with proactive experienced academic and support staff these risks can be managed.

1.6 Major programme change

All higher education programmes offered by ECT will be subject to periodic, systematic and comprehensive reviews for continuous improvement and adherence to Professional, Statutory and Regulatory Bodies (PSRB) requirements. This will be overseen by the Academic Board. Major changes to a programme will be carried out and apply to the next cohort of students. As good practice,

and where there are no changes to the learning outcomes or overall aims of a unit of study, academic staff will update units on an ongoing basis. Prescribed processes will be followed (in consultation with affected students) to ensure that proposed changes to programmes, in which students are enrolled, are reasonable and pose low risks and do in fact benefit the students. For example, replacing outdated content in line with the rapid changes in engineering technologies. Any major changes will aim to improve the relevance and currency of the programme rather than change the focus and nature of the course.

Changes introduced in line with the requirements of the OfS and the UK Frameworks for Higher Education Qualifications (FHEQ) are unlikely to negatively impact students. This also applies to the requirements for the Accreditation of Higher Education Programmes (AHEP) by the Institution of Engineering and Technology (IET) and the Professional, Statutory or Regulatory Body (PSRB). Such changes are generally introduced over a reasonable period of time to allow providers to align their programmes to new requirements and are thus deemed to be **low likelihood** and have **low impact**. Despite this, ECT, through EIT, has considerable experience in making changes to programmes.

1.7 Programme discontinuation

During the comprehensive programme reviews and continual research into new programmes, relevant to the modern engineering professional, ECT may identify programmes to be discontinued. This may be due to matters of industry relevance and/or for adherence to regulatory requirements. If a strategic decision is taken to close a programme, ECT will protect the students' interests by teaching out that programme before it is discontinued, in accordance with its Transition and Teach Out Policy and Procedures. The likelihood to students therefore is adjudged very low although the impact is assessed as medium.

1.8 Termination of partnership with EIT

EIT, the accredited and established Australian higher education learning provider, will support ECT during the first year of the three-year probationary DAPs period. In the event that EIT decides to discontinue the partnership, there would be a very high risk that students would be unable to complete their studies and achieve a higher education award. While the impact on all enrolled students would be very high, the likelihood of the termination of the partnership is very low, due to the following factors:

- The close relationship between these two corporate entities under common ownership will maintain the partnership.
- The exchange of common experiences and resources will encourage engagement and collaboration between the two entities, and ensure the quality of ECT's programme delivery.
- EIT's financial investment in ECT will provide the impetus to support the partnership, which is stipulated in the EIT-ECT Deed of Undertaking.
- The drive to protect EIT's reputation (with stewardship of the two independent Boards) will prevent a partnership termination.

1.9 De-registration by OfS

Obtaining and maintaining registration with the Office for Students (OfS) is a condition for ECT to deliver its programme in accordance with the New DAPs order that OfS granted to ECT. De-registration would, therefore, have a high impact on students. Furthermore, ECT will rely on OfS registration to be included in the Student Loans Company (SLC) system, enabling ECT students to access public funding. Therefore, losing OfS registration would pose a very high risk for all UK-based students as the OfS would suspend access to student support funding and/or OfS grant funding.

However, the likelihood of deregistration is most unlikely. ECT's quality systems and compliance with the Regulatory Framework for Higher Education in England (prior to issuing the New DAPs order) will have been thoroughly assessed by independent external academics and approved by ECT's Board of Governors and Academic Board. Furthermore, the positive recommendation from the Quality and Standards Review of the Quality Assurance Agency for Higher Education (QAA) to the OfS in March 2023 confirmed the quality of ECT's systems and processes covered in QAA's comprehensive review.

ECT has robust corporate and academic governance systems for adhering to the OfS conditions of registration. The governance arrangements ensure Board of Governors oversight of high-quality learning and teaching, and through the functions it delegates to the Academic Board. The structures to which the Academic Board delegates specific functions are the Programme Committees, Assessment Boards, Teaching, Learning and Quality Committee, and Industry Advisory Panel.

1.10 Failure to retain DAPs authorisation through and beyond the probationary period

ECT commenced programme delivery in 2025 after receiving an order from OfS granting authorisation for Degree Awarding Powers on a probationary basis for a three-year period, which the OfS could extend for a further probationary year. If ECT fails to meet the DAPs criteria, the DAPs

authorisation may be revoked during the probationary period or allowed to expire, which would require ECT to implement the provisions of this Student Protection Plan.

The **impact on students would be high** in the event of DAPs authorisation being revoked or not extended beyond the probationary period. The possible outcomes for the students would include:

- Students may not be able to be granted the degree awards at completion of the programme
- Students may not be able to transfer to another higher education provider
- Students may not receive recognition from another provider for some or all of the modules successfully completed during the ECT programme
- Students may have to repay their loans to the Students Loan Company or the funding they received from another source.
- The mitigation measures for the outcomes for students in the case of the loss of DAPs are described in par. 2.10.

However, **the likelihood of this outcome is most unlikely**. The New DAPs order will be granted on the basis of ECT's comprehensive three-year Probationary DAPs Plan which stipulates evidence of

achievement of milestones throughout the three years. The granting of the New DAPs order would confirm that ECT has met the quality, standards and other requirements for the OfS to grant the order. ECT has established robust processes for the continuous monitoring and evaluation of programme delivery throughout the three years, which will run concurrently with the OfS assessment of adherence to the DAPs criteria. ECT's governance and academic structures will address any potential and real threats to its DAPs status and submit evidence to OfS of corrective measures taken.

1.11 Disruption by external factors

The online delivery of ECT programmes reduces the risks and impacts of external factors on learning and teaching. Restrictions on the movement of people and/or damage to physical structures may occur during industrial action, terrorist-related incidents, natural disasters such as floods, the emergence of health crises. These disruptions are deemed a **low likelihood**, but the **impact** could still be considered **high**.

There are, however, other external factors which can affect the students' ability to access ECT's IT platforms. Extended power outages, for example, could interfere with the activities of both the lecturers and the students. The hacking of ECT's database, and other risks relating to information security are described under 1.3 Online programme delivery. In the case of unforeseeable or unavoidable circumstances, such as a large-scale pandemic, or other force majeure, the risk to ECT's business operations would be less than for a traditional face-to-face university.

ECT's IT infrastructure (including communications) is a key operational asset and essential for the delivery of programmes through the online delivery model, as well as for the day-to-day operations. There is a **low risk** of it failing during normal business, as a result of insufficient maintenance and/or aging infrastructure. This would obstruct students; for example, they will be unable to access the remote and virtual labs for compulsory exercises, for example. *These factors are considered in section 1.3.*

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

This section describes the measures ECT will put in place to safeguard the students' interests should the risks described above materialise – either partially or substantially. ECT has detailed policies and procedures to mitigate risk and protect students, including the Higher Education Fees and Refund Policy, Student Support Policy and Procedures, Students at Risk of Academic Failure Policy and Procedures, Transition and Teach Out Policy and Student Complaints and Academic Appeals policies.

2.1 Organisational risks

The following mitigation measures directly correspond to the organisational risks identified in Section 1.1 and are designed to reduce the likelihood and impact of those risks. The Board of Governors and Academic Board, , will ensure the effective and efficient implementation of ECT's comprehensive quality assurance systems and processes. Monitoring, reporting and continuous improvement processes have been established to identify and deal with potential and real organisational risks to ensure ECT's growth and sustainability as a high-quality provider of accredited engineering qualifications.

The following key mitigation measures are in place:

- The comprehensive governance framework with independent oversight, strategic decision making and long-term planning, strict internal and external financial controls, and periodic external assurance reviews
- Structured strategic planning processes, with an annual review of the Strategic Plan and monthly monitoring, by key staff, of progress against Key Performance Indicators, with actions to address divergence from the Plan and/or non-achievement of targets and objectives
- Terms of Reference of the Board of Governors and Academic Board and other organisational structures to ensure their effective functioning in ensuring high-quality programmes
- Scheduled reviews of the Terms of Reference and the quality and value of the contributions of the Boards and other structures
- An induction process for new Board members, with professional development interventions on their responsibilities, duties and accountabilities
- Succession planning for identifying membership expiry dates and seeking new candidates at least six months in advance of expiry/appointment
- Structured and quality assured processes for ensuring that the organisation has the staff with the required expertise, top-level educational technology for programme delivery, learning programmes and materials that meet UK educational and international engineering

standards, and effective systems for supporting students on their learning journeys from enrolment to graduation
- Clear communication to students and staff regarding codes of conduct and ethics, intellectual property rights, plagiarism and other forms of academic misconduct, as well as formal acknowledgement and undertakings to adhere to the codes, with non-disclosure agreements signed by staff
- Electronic plagiarism detection measures and invigilation software applied and regularly improved to ensure reliability and academic integrity
- Expeditious and professional management of negative publicity and complaints, such as harmful comments on social media platforms
- Continuous R&D on innovations to incorporate into programmes, educational technology and online delivery platforms, and publications/presentations on research in international forums.

If, despite these measures, ECT is forced to close, the following measures will protect students' interests:

- ECT will close in a phased manner to allow current students to complete their studies.
- Students will be supported to transfer to an equivalent programme, at another college or university. (As an online provider, EIT will be a viable option.)
- Students will be compensated financially for any loss suffered.

2.2 Financial risks

The following mitigation measures directly correspond to the financial risks identified in Section 1.2 and are designed to reduce the likelihood and impact of those risks. The following key mitigation measures are in place:

- Low enrolments on every programme are assumed, i.e. increasing from 1 to 15 for the Bachelor's degrees and 7 to 11 for the Master's degrees.
- Strict financial record keeping and controls will be exercised, including annual audits of overall financial accounts by an external chartered accountant, and monitoring of cash positions on a weekly basis, with a focus on detecting fraud and mismanagement.
- Cash flow projections will be monitored quarterly and appropriate expense management controls will be exercised if cash reserves drop below the threshold of 30% of revenue.
- Automated purchasing and payments procedure will be implemented, with expenditure controls.
- ECT will reserve sufficient funds to honour the bursaries it awards to qualifying enrolled students.
- ECT will retain sufficient funds to refund the tuition to students who are unable to complete their programme in the event of ECT ceasing operations.
- Where students receive loans from the Student Loans Company (SLC), ECT will refund SLC directly.
- Where tuition is paid by the student, parent, employer or a third party, refunds will be paid to the relevant bank account.

- The experienced marketing team will implement effective ongoing marketing of all programmes to focussed target markets.

2.3 Information Technology and online programme delivery

The following mitigation measures directly correspond to the IT and delivery risks identified in Section 1.3 and are designed to reduce the likelihood and impact of those risks. The following key mitigation measures are in place:

- Continuous upgrading of technology to ensure leading-edge web, video conferencing and remote labs
- Strategic reviews to provide alternative digital communication lines, if required
- Software licensing maintenance according to the update and expiry specifications
- Weekly testing for large groups operating remote labs - ensuring a high level of reliability of software and other equipment, with constant monitoring for intermittance and outages
- Monthly reviews of security infrastructure using dummy hacker attacks
- Server backups on a 24-hour rotation - with the capability to restore service. Monthly backups taken offsite
- Placing more IT resources into the 'cloud'
- Size and level of experience/seniority of dedicated IT support team
- Learning opportunities for existing high-level IT staff and rigorous recruitment of new IT staff
- Internationally-based staff availability for student support availability as a back-up
- Continuous research for the upgrading and innovation of existing IT infrastructure, for example online delivery platforms and delivery mechanisms.
- Fortnightly maintenance of the Virtual Learning Environment (VLE)and when required, the application of patches
- Anti-virus software scans of all student uploads on the VLE, and monthly scans on all the files on the VLE
- Web services facilitated by Cloudways and Digital Ocean, industry standards for cloud computing
- Security and firewall protection services largely outsourced to specialised service providers
- Cybersecurity monitored through the internal institutional risk monitoring framework, to prevent access to students' personal data, emails and software systems
- Additional authentication techniques for the VLE and the CRM, as well as backend monitoring for any unusual processes (e.g. Sophos).

In the event that ECT's IT systems are unable to be resuscitated within a week, a support arrangement with the sister college, EIT, will be established to provide IT services until ECT's systems are back in operation.

2.4 Academic and support staff

The following mitigation measures directly correspond to the academic and support staff risks identified in Section 1.4 and are designed to reduce the likelihood and impact of those risks. The following key mitigation measures are in place:

- The small number of students means that quality learning can be offered by a relatively small number of staff with the necessary breadth and depth of expertise.
- The online delivery model enables ECT to recruit academics internationally, with the required engineering qualifications, appropriate higher education experience, and expertise as practicing, registered engineers.
- EIT's highly qualified and experienced staff will provide managerial, technical and student support during the initial stages of ECT's operation. This will include the Dean (EIT), the managers responsible for Academic Resources, IT, Finances, and Student Recruitment/Marketing. ECT will employ staff to replace them over the first twelve months of its operation.
- ECT's full-time employed academic staff will be supplemented with part-time academics who have been selected through a rigorous selection process and contracted to partner with ECT over long periods.
- Remuneration packages will be monitored against comparable rates in higher education to remain attractive for quality faculty.
- The impact of a shortage of high-quality staff will be ameliorated by the employment of a number of lecturers in a part-time role (while they are working for other universities or institutions of higher learning). Lecturers can be remotely-based, as long as they have access to a broadband internet connection.

Experienced UK-based Human Resources consultants will be used to help address the deficiency that may arise in academic and support staff.

2.5 The quality of the student learning experience

The following mitigation measures directly correspond to the student experience risks identified in Section 1.5 and are designed to reduce the likelihood and impact of those risks. The following key mitigation measures are in place:

- The Academic Board is the body responsible for academic oversight and for maintaining the highest standards of learning and teaching. It is supported by the corporate and academic governance structures (indicated in par. 1.9) to which it delegates specific functions; these together will ensure the quality of the student learning experience.
- ECT has Learning Support Officers and other dedicated staff, including Course Advisors, Admissions Officer and IT support staff, to provide technical and personal support to students - from application through to graduation. This is a critical addition for online learners who do require guidance and support, other than what they receive through the live content sessions with their lecturers.

- ECT's UK-based staff will interact directly with ECT students to provide academic, technical and personal support. Students will also have access to online support from remotely-based staff during other time zones.
- ECT's quality assurance system includes policies and procedures for supporting students, particularly those who are at risk of not completing programmes or failing to meet the requirements for graduating. There are provisions for students to formally raise complaints, and academic appeals. These will be dealt with using processes which are fair and transparent, which protect students' rights, and where needed corrections and improvements will be implemented to satisfy students.
- The prescripts relating to students' rights to lodge complaints and academic appeals, also apply to real or perceived bias, prejudice and unfair treatment, or any other grounds which may negatively impact on a student's access, participation and/or success in ECT's programmes. These prescripts are stipulated in the *Student Complaints Policy and Procedures, and the Academic Appeals Policy and Procedures*.
- Unsatisfactory student assessment submission rates, participation in scheduled learning activities, low marks and pass rates will be continuously monitored against the assessment rubrics and dealt with through special measures. Assessment-related risks will be dealt with in accordance with the *Assessment and Feedback Policy and the Students at Risk of Academic Failure Policy and Procedures.*
- ECT will promote widening access through scholarships designed to support participation in engineering education.
- Individual support will be provided to students whose work, medical condition or disability, financial hardship, or family and/or personal circumstances are having an adverse effect on their learning and progress. These support mechanisms will include alternative or modified assessment methods to ensure the equitable assessment of students, extensions on submission dates, supplementary assessments and deferred examinations, where warranted. Where required, students will be referred for external specialised services, such as counselling, medical, welfare or legal support.

Additional academic support will be provided to individual students who request support or are identified as needing support. This will involve a study skills programme to assist students with essay writing, research, referencing, etc. English Support will also be available to provide additional support for written and verbal communication, and for students who need help mastering the mathematical components of the programme.

- Staff will be encouraged to use the growth opportunities and funding ECT makes available. This will include training and continuous professional development, and interventions targeted at specific needs identified through negative student feedback and/or staff performance appraisals.
- Student satisfaction will be monitored through direct interaction with academic and support staff, the Student Council and also measured through surveys at the end of modules and programmes. Their concerns and recommendations will be key to the annual structured

programme reviews that include feedback from lecturers, support staff, external academics, industry partners and engineering professionals.

2.6 Major programme change

The following mitigation measures directly correspond to the major programme change risks identified in Section 1.6 and are designed to reduce the likelihood and impact of those risks. The following key mitigation measures are in place:

- Any proposal for a major/material change to a higher education course structure, content or delivery will require a major modification, with changes approved in line with the Quality Framework: Modifications to Programmes and Modules.
- Minor changes to programmes and/or modules that constitute continuous improvement, whilst maintaining coherency of the programme, will also be approved in line with the Quality Framework: Modifications to Programmes and Modules.
- When a proposed change removes or replaces core units of study, affects the credits, or changes the programme structure in any way that may affect students, pragmatic transitional arrangements will be made to ensure that students are not unduly disadvantaged and can continue and complete their programmes within a reasonable time period. This includes a clearly defined mapping document that indicates the articulation from the current to the proposed structure.
- At least six weeks' notice will be given to students and lecturers before material changes are made to continuing programmes. The responsibility for informing current students, applicants, and offer-holders of any approved changes to programmes is provided in the Quality Framework: Modifications to Programmes and Modules.
- The Teaching, Learning, and Quality Committee will ensure that no material change will lead to the discontinuation of the programme in which students are enrolled, an increased work load, or otherwise impact negatively on the students. Students will be consulted on the changes. Where the changes are deemed beneficial to enrolled students, the implementation of changes will be accelerated for current students, whilst adhering to internal and external quality standards.
- In the event that ECT is unable to deliver material components of a programme, it will take all reasonable steps to mitigate the risk, which could include arranging additional staff and/or rescheduling teaching sessions.
- In the event that a new component or module is introduced to a programme, ECT has an extensive pool of faculty across the world from which appropriately qualified and experienced academics can be sourced. The online delivery removes the limitation of the physical locality of faculty.
- The analysis of changes in the requirements of external regulatory bodies will form an integral part of all scheduled and ad-hoc programme reviews. Therefore, ECT will monitor all changes to the requirements of the OfS, the FHEQ and the PSRB. It will adapt its programmes to align with the new requirements within the stipulated timeframes to ensure that it retains registration and accreditation. Records of changes to programmes will be kept for quality assurance reporting.

If students are still unhappy with the mitigation measures to programme changes noted above; ECT will:

- Endeavour to minimise the impact on students with modified programme structures after getting approval from the Teaching, Learning and Quality Committee/Academic Board.
- Allow students to withdraw from the programme.
- Provide compensation to students who have to withdraw from the programme because of major changes.

2.7 Programme discontinuation

ECT is committed to ensuring that students are able to complete the programmes for which they have enrolled. The teaching out of programmes will be the preferred option if there are valid reasons for ECT to suspend or discontinue a programme. ECT will endeavour to enable the students to complete their studies in accordance with its *Transition and Teach Out Policy and Procedures.*

The following mitigation measures directly correspond to the programme discontinuation risks identified in Section 1.7 and are designed to reduce the likelihood and impact of those risks. In the unlikely event that teach-out by ECT is not possible, the key mitigation measures and alternative arrangements could include:

- Arrangements for ECT students to complete the programme through the sister organisation EIT, in accordance with the Memorandum of Agreement between the two entities.
- ECT will offer students the option to transfer to an alternative programme of ECT on condition that the student meets the entry criteria and other requirements of the programme, including those from the PSRB.
- ECT will support students to transfer to other providers, which could include:
- Identifying another registered higher education provider that offers similar or equivalent programmes/modules and which meet the particular needs of the student cohort; and supporting students while they transition.
- The provision of the students' detailed academic transcript to facilitate credit transfer arrangements and admission into the receiving provider.
- If such alternatives are not feasible or agreed to by some or all the enrolled students, ECT will refund the tuition fees in full to the students who select that option within 28 days, in accordance with its *Higher Education Fee and Refund Policy.*

2.8 Termination of partnership with EIT

The following mitigation measures directly correspond to the risks triggered by the termination of the partnership with EIT, as identified in Section 1.8 and are designed to reduce the likelihood and impact of those risks. The following key mitigation measures are in place:

The Board of Governors and Academic Boards of both institutions will monitor adherence to the *EIT/ECT Deed of Undertaking* to ensure that the stipulations in the Deed are strictly adhered to by both parties, and that factors that negatively impact on the Deed are addressed without posing a financial risk to enrolled students.

- The Board of Governors and Academic Boards of EIT and ECT will conduct oversight over ECT's programme delivery and the EIT support to ECT during the first year of DAPs to ensure that the DAPs criteria are met. ECT's quality assurance systems include multiple monitoring and evaluation processes for the identification of potential or real risks to the partnership in supporting ECT to meet the DAPs criteria. Regular reports on areas of concern relating to noncompliance to internal and external requirements will be addressed by the senior management expeditiously and effectively, with serious risks escalated to the Academic Boards for submission to the Board of Governors of both institutions, where needed.

2.9 De-registration by OfS

The following mitigation measures directly correspond to the risks triggered by the de-registration by OfS, as identified in Section 1.9 and are designed to reduce the likelihood and impact of those risks. The key mitigation measures in place:

- The Board of Governors and Academic Boards of ECT will conduct oversight over ECT's comprehensive quality assurance systems, to ensure that they are implemented by the academic and management structures and staff in adherence to the OfS quality and standards conditions for registration.
- ECT's quality assurance systems include multiple monitoring and evaluation processes for the identification of non-compliance to requirements that pose a potential or real risk to the OfS deregistration. Regular reports on areas of concern relating to non-compliance to OfS requirements will be addressed by the senior management expeditiously and effectively, with serious risks escalated to the Academic Board for submission to the Board of Governors, where needed.
- The Quality Assurance and Compliance Manager of ECT will remain informed of changes to OfS requirements, meticulously monitor and report on non-compliance and take appropriate measures, which would include strengthening compliance requirements, upgrading monitoring mechanisms, improved communication of requirements to the Boards, structures, staff and students, and the continuous review and updating of policies and procedures.
- In the event that the OfS deregisters ECT, OfS may approve transitional provisions for ECT to teach out the enrolled students after deregistration to allow students to continue to access the student support system until the end of their programme. The teach-out will be conducted in collaboration with EIT, in accordance with ECT's *Transition and Teach Out Policy and Procedures.*

2.10 Failure to retain DAPs authorisation through and beyond the probationary period

In the event of ECT losing the DAPs authorisation during or beyond the probationary period, ECT will support and guide students to be able to complete the programme in order to be granted the degree awards. The key mitigation measures include:

- Option 1: ECT will arrange for the students to be transferred to the similar online degree offered by its sister institution, and the transfer of all the equivalent credits to the EIT degree, without students incurring any additional costs.
- Option 2: If option 1 is not desirable for some or all students and where this is possible and academically appropriate, ECT will establish a short-term partnership with another registered higher education provider that offers similar or equivalent programmes/modules and support students in the transition to this institution to complete the programme and achieve the award from that institution. ECT will provide the students' detailed academic transcript to facilitate credit transfer arrangements and admission into the receiving provider.
- If neither of the above two options is feasible or agreed to by some or all the enrolled students, ECT will refund the tuition fees in full to the relevant students within 28 days, in accordance with its *Higher Education Fee and Refund Policy.*
- In the case of students who do not want to transfer to EIT or another provider, ECT will provide the students' detailed academic transcript to facilitate credit transfer arrangements with another provider when they wish to continue with their studies.
- In all the above cases: Students will be refunded any tuition fees paid for the modules not yet completed at ECT and compensated for any demonstrable and material financial loss. ECT has sufficient cash reserves to provide refunds and compensation to students, which is made possible by the EIT-ECT Deed of Undertaking in which EIT undertakes to cover the costs of ECT's liabilities to a maximum of £1 million for a period of 5 years (in the unlikely event this is required).

In addition to the above, the following general mitigation measures in place:

- ECT has developed a comprehensive DAPs Plan that describes the systems and processes that have been established for learning and teaching during the probationary period and thereafter. The granting of the DAPs order by the OfS, will serve as confirmation of the OfS judgement that the Plan is credible and realistic and that ECT has put in place effective measures for the implementation of the Plan to meet the DAPs criteria.
- The quality and industry relevance of ECT's programmes have been confirmed by external members of the Academic Board and Board of Governors as meeting applicable UK higher education and international engineering standards.
- ECT's comprehensive academic frameworks will ensure that the academic standards for the awards credit and qualifications are maintained and continuously reviewed and updated.

- The DAPs Plan will be closely monitored and evaluated by ECT's Board of Governors and Academic

Board and other structures, as well as by the external academics and industry partners. ECT will provide OfS with quarterly monitoring reports and substantiating evidence that will be generated during the probationary DAPs period and include student feedback on the quality of ECT's programme and the measures for supporting students and protecting their rights.

- The OfS will closely monitor and evaluate the implementation of the New DAPs Plan at quarterly intervals to ensure that ECT is meeting the New DAPs criteria during the probationary period, in preparation for meeting the full criteria for being granted Full DAPs at the end of the probationary period.

2.11 Disruption by external factors

The following mitigation measures directly correspond to the risks triggered by disruption by external factors, as identified in Section 1.11 and are designed to reduce the likelihood and impact of those risks. The key mitigation measures in place:

- The management of buildings in which ECT rents offices are legally responsible for undertaking regular safety audits, maintenance and testing of systems to ensure that the building remains fit for purpose and that the requirements relating to occupational health and safety are adhered to.
- ECT staff will raise any potential or real risks with the management of the premises, where needed.
- Health and safety protocols will be adhered to and will include the training of all staff in adherence to health and safety measures in ECT's offices. There will be six-monthly checks of fire protection and First Aid kits, and emergency evacuation procedures will be executed as scheduled.
- If there is a potential or real risk to the physical premises, ECT will relocate to another building. ECT's business processes can be moved online with minimal risk to the students' learning, or to the operations of the business.
- ECT's facilities for technology will ensure that the classes proceed as scheduled and the staff, including the student support staff, will be trained to handle any issues/concerns that may arise as a result of disruption by external factors.

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

3.1 Eligibility for refunds

ECT's Higher Education Fees and Refund Policy sets out clear arrangements for tuition fee refunds, including a stutory cooling-off period of 14 calendar days for undergraduate programmes and 28 calendar days for postgraduate programmes, during which students may withdraw without financial liability. Beyond this period, fee liability and any applicable refunds are determined based on the timing of withdrawal and the circumstances, including approved special circumstances.

The refund eligibility if summarised in Table 1 below.

Table 1: Refund eligibility for students

Circumstances	**Refund**
New student who has paid tuition fees and withdraws or defers before the cooling-off period	Yes: Full refund of tuition fees.
Continuing student withdraws on or before the cooling-off period.	Yes: Full refund of tuition fees.
ECT withdraws the offer of enrolment: • If the student fails to meet the entry requirements, such as the stated level of English. • Based on incorrect or incomplete information provided by the applicant.	Yes: Full refund of tuition fees.
ECT default (i.e., ECT is unable to deliver the programme). ECT may offer students a place in an alternative programme at ECT. In such circumstances there will be no additional cost to the student.	No refund if the student accepts an alternative programme.

ECT default (i.e., ECT is unable to deliver the programme). ECT may offer students a place in an alternative programme with another registered provider. In such circumstances there will be no additional cost to the student.	Yes: Refund of any unused tuition fees if the student cannot be placed in an alternative programme. No refund if the student accepts an alternative programme.
Withdrawal after the cooling-off period with no special circumstances.	No refund
Withdrawal after the cooling-off period if the conditions for special circumstances are met.	Possible refund if the special circumstances apply

Special circumstances may apply for the payment of a refund, when withdrawal is after the cooling-off period. ECT will make an assessment that the special circumstances stipulated in the Higher Education Fee and Refund Policy apply, which include medical, personal/family, military service or employment related circumstances that have changed to such an extent that the student is unable to continue studying. In addition to meeting the prescripts in this policy, the student must have:

- Been enrolled in the module after the cooling-off period.
- Not successfully completed the requirements of themodule.
- Submitted a written application for special circumstances using the prescribed form with submitted evidence

The refund eligibility that apply under special circumstances are summarised in Table 2 **below**.

Table 2: Possible refunds under special circumstances

Circumstances	**Refund**
Withdrawal from a module or programme due to special circumstances beyond the control of the student.	Possible
Withdrawal from a module or programme after the cooling-off period.	No
ECT cancels a student's enrolment due to reasons of unsatisfactory progress, misconduct, lack of attendance or a student has provided fraudulent or misleading information.	No
ECT cancels a student's enrolment due to non-payment of tuition fees or other fees and charges.	No

After submitting a formal complaint, in accordance with the Students Complaints Policy and Procedures and Academic Appeals Policy and Procedures.	Possible: tuition fees may be refunded in full or in part, depending on the outcome of the appropriate process.

3.2 Appeals against refund decisions

Students may seek a review of any decision related to a refund application by submitting an appeal to within 14 calendar days of receiving the notice. The appeal must be accompanied by supporting documentation. A designated senior member of staff not involved in the original decision will consider appeals relating to refunds. Students will be notified of the decision within 14 calendar days of ECT receiving the application. If the student remains dissatisfied, they may pursue further resolution through ECT's Student Complaints Policy, or, where applicable, the Office of the Independent Adjudicator (OIA).

3.3 Payment of refunds

The tuition fee can be refunded, depending on the student's eligibility and the special circumstances.

The following costs are not refundable: administrative fees, incidental charges, fines and penalties. The Fee Schedule on ECT's website indicates the non-refundable fees and charges, noting that fees and charges may vary from time to time.

Refunds will be processed in accordance with the Higher Education Fees and Refund Policy, normally within 28 days of approval of a complete application.

The undertaking by its sister institution in Australia in the EIT-ECT Deed of Undertaking makes provision for funding to meet ECT's liabilities relating to refunds to students.

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

4.1 Communication to students and staff

This Student Protection Plan will be available on ECT's website and the stipulations in it will be explained to enrolled students during their compulsory induction, as part of the overview of all ECT's policies, procedures and rules/codes that apply to them. They will also be informed of:

- Where to access the Plan on the ECT website

- The contact details of the Learning Support Officer (LSO) and the Quality Assurance and Compliance Manager who they can engage with if they have concerns about the provisions in the Plan
- Their rights to lodge appeals or complaints relating to provisions in the SPP, in accordance with ECT's Student's Complaint's Policy, Or Academic Appeals Policy.
- Their rights to appeal to external entities, such as the Office of the Independent Adjudicator for students in higher education (OIA), if the complainant is not satisfied with the internal complaints, and appeals handling process.
- Their rights under Consumer Law, as described in ECT's Consumer Protection Policy and Procedure.

The SPP will be explained to all ECT's full-time staff during their induction and during the contracting of part-time academics, with references to specific sections that are relevant to their roles in ECT. The

SPP will be included with the policies, procedures and related documents that are on ECT's staff SharePoint that they should familiarise themselves with before commencing work with ECT.

Staff will be informed of the implications of significant changes to programme delivery on students in relation to the SPP. Staff should raise any risks and/or concerns relating to provisions in the Plan with the Head of College Operations.

4.2 Review of the Student Protection Plan (SPP)

The Academic Board will oversee the annual review of the SPP. This will be in consultation with senior lecturers, managers who are involved in academic-related processes, and student representatives. They will consider any changes in the risk assessment. Notices will be sent to staff and students before the annual review to invite individual and collective recommendations on areas for improvement. Any changes to the SPP will be recorded in updated and approved versions that will be accessible on the ECT website to students and staff.

In addition to the annual reviews, the Head of College Operations will set up an ad-hoc committee to deal with areas of the Plan that require urgent attention. During its quarterly meetings, the Board of Governors will attend to any concerns that have been raised relating to the Plan and make decisions on changes.

The first cohort of students will be encouraged to form a student representative body that will take on the responsibility of providing student input on the SPP for consideration during the above-mentioned meetings.

4.3 Implementation of the SPP

In the event that the realisation of risks or other circumstances require the implementation of the Plan, the following will be explained and provided to students:

- Why the SPP is being implemented
- The implications for the students' programme of study

- The options available to the students
- Arrangements for support and guidance to affected students
- Service contact details for independent advice.

The Leaning Support Officers will act as conduit between students and senior staff and/or academics, to ensure that appropriate action is taken timeously in supporting students collectively and individually.

4.4 Protection of consumer rights

All communication to students on the SPP will adhere to the protection of consumer rights in accordance with the Competition and Markets Authority (CMA) guidance for universities on the application of Consumer Rights Legislation. This will ensure that:

- Students are provided with up front, clear, timely, accurate and comprehensive information
- Marketing communication is accurate and correctly reflects the status of the programmes in relation to professional registration
- Marketing communication correctly describes the situation in the event that there are changes to ECT's DAPs status
- Terms and conditions between ECT and the students are fair
- Complaint handling processes and practices are accessible, clear and fair to students.

5. Review and approval

The Student Protection Plan will be reviewed annually by the Academic Board in consultation with senior academic staff and student representatives, and approved by the Board of Governors.