

Annex D: Template for a student protection plan

Provider's name: CEG UFP Ltd

Provider's UKPRN: 10057213

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Student protection plan for the period 2022-2023

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

ONCAMPUS is the trading name of CEG UFP Ltd. ONCAMPUS is owned by, and provides programmes as part of, the Cambridge Education Group ("CEG"). CEG is a UK-based global group specialising in the provision of high quality academic and English language programmes for international students, preparing thousands of students to progress onto the world's leading universities. CEG delivers these programmes in 30 schools and centres across the UK, the USA, and Europe. Total gross revenue for the Group is approximately £150 million.

CEG itself is owned by Bridgepoint, which is a blue-chip international fund management group focusing on private equity and have £13bn assets under management. As a long-established, experienced and responsible investor, Bridgepoint helps companies and management teams by investing in expansion and operational transformation. CEG is committed to supporting students to achieve academic success and has the financial capability and resources to protect students, and wherever possible, ensure continuity of study regardless of the individual circumstances of ONCAMPUS. CEG has a programme of investment in ONCAMPUS including expanding and improving facilities and accommodation.

The risks associated with changes in ownership of the company (including changes to the legal entity that owns and runs the company) or where CEG decide to amalgamate the company with another legal entity are low. We will provide notification to all stakeholders if we plan to do this and we will ensure that the transfer will not affect the existing rights of any students.

CEG Group Management continuously monitor the financial performance and sustainability of CEG, including ONCAMPUS. A CEG Board meeting is held monthly, with a Board comprising CEG Management, Bridgepoint appointed Directors and a non-executive Chairman. The Group's financial performance is discussed in detail at each meeting.

CEG currently has more than 4250 students and 1200 members of staff. We are confident therefore that there is a very low risk of institutional closure or of significant material change.

The risk that we will no longer deliver courses at any of our centres in the next 4 years is very low.

The risk of revocation of our Tier 4 licences is low risk. ONCAMPUS has held a Tier 4 licence continually for 14 years (since Tier 4 was launched in March 2009) without suspension or revocation. CEG provides an umbrella licence for several education providers within the CEG. Should one of the two ONCAMPUS Tier 4 sponsor licences be revoked, there are different impacts to international students subject to Home Office's sanction:

- Prospective students: their visa will be cancelled or visa applications being refused. We will need to refund their fees in full and advise them on alternative study options
- Enrolled students with extant visa: Home Office may allow those students to continue with their studies for a limited period which may allow them to complete their course. Those who cannot complete their studies within the period allowed by the Home Office sanction will receive assistance to transfer to the other centres to complete their studies. It is worth noting the current Tier 4 regulation does allow students in this situation to switch sponsors inside the UK.

While an inability to recruit Tier 4 students, would have significant impact on the business, for students the impact would be that they could not come to ONCAMPUS.

The risk that we are no longer able to deliver material components of our courses is very low because we design our programmes to be taught by integrated teams of academic staff. We operate a centralised curriculum where pathway and programme leaders design curriculum and assessments for all ONCAMPUS centres. This allows us to guarantee sufficient academic staff are employed to ensure continuity of delivery and breadth of knowledge. The risk of major changes in-year to course content is very low. We have operated a centralised curriculum since ONCAMPUS's inception in 2009, and we are considered sector leading in this regard.

Non-renewal of the contracts with our partners is a low risk. We have operated contracts with UCLan and LSBU since inception in 2009, and our other partners are subject to similar contractual arrangements. We undergo contract renegotiations with our partners on a five year basis generally. Should the agreement not be renewed, students registered at that particular ONCAMPUS centre will be permitted to complete their intended studies at the centre, subject to normal timescales. This is detailed in the contracts with each university partner.

Disruption to delivery by industrial action is low. We don't recognise any unions at any of our centres.

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

The strategic decision to close, or change, a programme due to insufficient enrolments may result where delivery is determined to be non-viable from an academic, student experience or resourcing perspective. In such cases, we will make every effort to ensure that existing students will be transferred to other centres. Programme/subject level closures will be carefully managed over a sufficiently long time frame to mitigate against any impact on students and their experience.

In cases where it is determined that it is in the best interest of students to transfer to an alternative course or route for the completion of studies, the rationale will be fully articulated, together with a mapping of course learning outcomes to the proposed alternative course or route, to ensure that standards are maintained and that students are not disadvantaged. At ONCAMPUS, because we operate a centralised curriculum, students are effectively able to transfer to another centre offering that particular programme without negative effects. Exceptionally, where teaching cannot be completed or where none of the proposed options is acceptable to the student, ONCAMPUS may refund all or part of paid fees.

To safeguard the student experience during periods of change such as programme closure ONCAMPUS will work closely with affected students and the university partner. Our approach to this is detailed in the contracts we have with our partners, and the procedure takes into consideration the impact of such decisions on current students, potential applicants, applicants, academic and support staff.

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

Our refund policy is available at <https://www.cambridgeeducationgroup.com/about-us/ceg-refund-policy.htm>

It should be noted that ONCAMPUS only recruits international students with no recourse to public funds, and our refund policy reflects this context.

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

The Student Protection Plan is published on the ONCAMPUS website and via links to staff and student portals. The CEG refund policy is already available on the main CEG website. The Student Protection Plan and the Refund and Compensation Policy is highlighted to all students on their initial registration and subsequent enrolment at centres. Staff are made aware of the Student Protection Plan and the Refund and Compensation Policy and the resulting implications via staff training days.

The Student Protection Plan will be reviewed on an annual basis. Student consultation will inform the review process. The Student Protection Plan will be approved by CEG UFP Ltd Academic Board, and then the CEG UFP Ltd Governing Body.

Where material changes have been proposed to one of our programmes these will generally only be made for future applicants and not cohorts on the programme. Where the changes are proposed for existing applicants and/or current students their explicit agreement is required prior to the proposed changes going ahead.

Where a proposal is made to close, or significantly change, a programme discussion will be held with student and staff representatives, and our respective university partners, while the proposal is under consideration. Applicants and enrolled students should be the first to be informed once a formal decision to suspend, cease or significantly change a programme has been made. Communication of the decision should be made in writing to all affected individuals so that they are made aware of the actions to be taken, including a timeline of events, and the resulting impact of the actions during the implementation of the change. We aim (subject to matters being within our control) to provide at least 10 weeks' notice of any changes coming into effect after students first enrol. At that time, their attention will be drawn to this Student Protection Plan, and to the Refund and Compensation Policy.