



## Student Protection Plan 2025-26 (v1.3)

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### Introduction

The UK Higher Education and Research Act 2017 requires OnCampus (part of Cambridge Education Group) to have a Student Protection Plan, to protect your interests and detail the steps we would take where significant or material changes have had to take place affecting the continuation of your study, such as (but not limited to):

- disruption to your OnCampus programme and its delivery;
- the unanticipated departure of key members of OnCampus staff;
- the cessation of programme delivery, likely cessation, or change of delivery mode;
- major changes in year to programme content or your curriculum;
- suspension and/or revocation of OnCampus's Student Sponsor Licence;

- a decision to close an OnCampus centre.

OnCampus students come from diverse backgrounds and, in the event of the realisation of any of the risks covered in this plan, will have different support needs. This includes but is not limited to students sharing particular protected characteristics (as defined in the Equality Act 2010). In implementing any measures to protect continuation of study we will consider the impact of changes for students with different needs, characteristics and circumstances.

## Section 1: OnCampus Approach to Risk Assessment

OnCampus is confident that its management of risk, through a multi-layered approach, is robust. OnCampus operates a risk management process where a risk register and accompanying action plan is created and regularly reviewed within the formal governance structure for OnCampus. This includes the Risk Committee, the CEG UFP Board and CEG Group Board. Risks are assessed in terms of likelihood and impact, and each is defined as one of the following:

Category	Score	Definition
Rare	1	Highly unlikely – High unlikely to occur in the following 12months. Less than 20% probability
Unlikely	2	Risks in the unlikely category have a relatively low chance of occurring in the following 12 months (between 20% but less than 40% probability)
Possible	3	Possible risks may happen about half the time and may occur in the following 12 months (between 40% but less than 60% probability)
Likely	4	A likely risk has between a 60% but less than 80% probability of occurring in the following 12 months. These risks need regular attention, as they are bound to re-occur and therefore require a consistent migration strategy.
Almost Certain	5	Almost certain – highly likely to occur in the following 12 months (greater than 80% probability).

Furthermore, Cambridge Education Group recognises that unexpected major incidents have the potential to cause significant disruption to the day-to-day operation of OnCampus. There is a robust Business Continuity plan in place to ensure that OnCampus can not only deal with the immediate consequences of a major incident but also consider, plan and react to long-term impacts of any disruption to OnCampus operations, where practical, and improve resilience. OnCampus’s business continuity and incident management planning is guided by the following core aims:

- to protect people from harm;
- to protect critical infrastructure and facilities;
- to resume teaching and key services in an appropriate timeframe, with the minimum of disruption.

It should be noted that this Plan explicitly deals with risks to the continuation of study. It does not address risks to the quality of the content or delivery of courses and these risks are addressed through its Quality Framework and other established policies and procedures.

## Section 2: Assessment of the range and level of risks to the continuation of study for students

2.1 The risk of *institutional financial failure resulting in the institution as a whole being unable to operate* (meaning students could not continue their studies) is considered to be '**unlikely**' despite the increasing funding pressures and expenditure increases experienced throughout the sector. This is for the following reasons:

- a. Cambridge Education Group's finance strategy is designed to ensure the long-term success of OnCampus and the wider group, and its financial performance is monitored regularly on a monthly basis, with quarterly reporting to the CEG UFP Board. The ongoing monitoring enables, if required, the proactive application of corrective action including such measures as the sale of assets, creating a more agile cost base through a continuing transformation programme, portfolio review, and driving income generation through the development of new opportunities and other initiatives;
- b. The financial KPIs Cambridge Education Group operates within have been set primarily to ensure long-term financial sustainability, and the Group has robust financial management procedures in place;
- c. A 3-5 year financial forecast is regularly produced for review to ensure key assumptions are reasonable. These forecasts evidence the future financial sustainability of OnCampus and include sensitivity analysis of key assumptions; annually a financial forecast is submitted to the regulator, the OfS who review the financial sustainability of OnCampus;
- d. Based on the most recent statutory accounts (2024-25), Cambridge Education Group has a reasonable expectation that there are adequate resources to continue in operational existence for the foreseeable future, meeting liabilities as they fall due. Cambridge Education Group therefore considers itself to be managing the business successfully;
- e. The Cambridge Education Group risk management plan identifies the critical financial activities OnCampus undertakes, which includes financial planning, etc.

2.2 The risk of *OnCampus losing its registration with the Office for Students (OfS)* is considered **rare** due to a comprehensive, embedded academic and corporate governance framework that ensures that checks, controls and systems are in place to prevent events that would lead to this occurrence. OnCampus has a robust framework in place that ensures all conditions of registration with the OfS are attached to a senior member of the Academic Board and CEG UFP Board. This framework is overseen by the OnCampus Academic Board and reported for assurance to the Risk Committee and CEG UFP Board.

2.3 Though rated as **unlikely**, there is a higher risk of *interruption or damage to OnCampus's IT structure* reflecting not only the possibility of internal service failure but also the

increasing threat of a significant, successful cyberattack upon Cambridge Education Group due to the current global threat to cybersecurity (see section 2 for mitigation measures and consideration based on students' needs and circumstances).

2.4 The risk of the *possible unavailability of OnCampus accommodation to provide teaching* due to the late delivery of transformational capital projects is considered to be **unlikely** due to existing established controls (e.g. early and ongoing tracking of various work stages against the master programme).

2.5 The risk of *failure of a university partnership resulting in termination of the partnership* is considered to be **unlikely**, although due to the unpredictable political and financial environment within which partners operate, we have included details of our mitigating actions in respect of this aspect of our provision. Mitigation against the failure of University Partnerships includes:

- a. Comprehensive due diligence checks (assessing audited accounts, contractual relationships, potential conflicts of interest etc) are undertaken prior to the approval of a new university partnership.
- b. All partnership arrangements are governed by a legally binding collaborative agreement which details the basis of the relationship and ensures that appropriate provision is made to allow students studying on courses to complete their courses in the event of termination of the partnership;
- c. Periodic review of the financial and quality assurance health of university partnerships is undertaken by the OnCampus Executive Group through the Annual Business Review process;
- d. OnCampus's response to the failure of a university partnership would depend on the given situation with the priority focus being to facilitate teaching-out, where required, and to ensure the maintenance of the student experience. This response has been tested on several occasions in the past as OnCampus has previous experience of terminating partnerships. OnCampus would trigger such a termination in circumstances where the interests of students were at risk as a result of the continuation of the partnership, or the partnership was for some other reason unsustainable. However, the continuity of study for students is always treated as paramount in such situations which is underlined by the provisions made explicit through our partnership contracts. We operate a centralised curriculum, therefore should a partnership fail we could move students to another OnCampus centre and resolve any progression issues once students were moved over. We would support students financially to support their transition, including accommodation costs.

2.6 The risk of *failing to maintain OnCampus's UKVI licence*, which would directly affect all of our students, is considered to be **rare** due to the dedicated internal resource within the Immigration Compliance and Advice team which has focussed on ensuring that OnCampus is

compliant with UK Home Office immigration rules and requirements as evidenced by the Basic Compliance Assessment statistics. OnCampus has held its student sponsor licence since 2009 in good standing and passed its last audit successfully.

2.7 The risk of *closure of all or part of one or more of OnCampus's centres negatively affecting academic delivery* is **rare**. Unexpected events requiring a temporary campus closure are also highly unlikely and would be managed by our major incident and business continuity procedures, which would focus on minimising student impact and bringing centres back into service as soon as possible or moving deliver to alternative locations on campus or at alternative sites.

2.8 The risk of OnCampus *failing to complete the teaching of a course* is considered to be **rare**. It is possible that courses may become non-viable from a student experience or academic perspective – a course may be identified for closure due to a number of reasons including portfolio review, insufficient enrolments, or the temporary or permanent loss of key staff. Given OnCampus's interest in delivering courses that meet student needs, the academic portfolio is constantly monitored, reviewed and refreshed. OnCampus therefore has considerable experience in managing programme availability, withdrawing unviable courses where necessary, ensuring that student interests are at the forefront of any planning. OnCampus closely manages the likelihood of the withdrawal of a course, as well as the closure process itself, to ensure continuity of study for students and their experience in these circumstances through the following measures. Given the nature of OnCampus courses being at the maximum one academic year in length, it is extremely unlikely that a programme would be closed once it has started delivery; however it may be closed to new enrolments at the following intake:

- a. A monthly process of portfolio scrutiny, through the Course Viability Review, the results of which are reported through the academic governance via Academic Board. The process tests the viability of each course from the academic, financial, quality and general health perspectives and is therefore able to identify risks to particular courses and formulate action plans accordingly;
- b. A 'discontinuation and phasing-out of courses' procedure is followed when a course is identified for closure in order to capture and monitor teaching-out arrangements during the phasing out period to ensure not only the continued quality of teaching and learning but also the maintenance of the student experience until all students have completed their studies.

2.9 In summary, OnCampus does not assess any risks as either **likely** or **almost certain** at the time this Plan was agreed.

## Section 2: The measures that we have put in place to mitigate those risks identified above as higher risks and what it would mean for students:

2.1 Mitigation against the risk of interruption or damage to Cambridge Education Group's IT structure includes:

- a. The identification of specific staff within IT to undertake ongoing risk assessment;
- b. Review, internally and externally, of risks in order to ensure that it reflects the current level of external threat;
- c. The introduction of a regular penetration tests and vulnerability scanning of targeted areas of the network and systems;
- d. Firewall protection of the network, internal segregation using virtual separation and monitoring at the network level of external network threats;
- e. Security software which provides alerts and removal of virus threats;
- f. Enhance focus on systems recovery procedures to ensure OnCampus would return to operation in the shortest timeframe possible if it were to lose service due to an IT/cyber attack.

OnCampus's response to interruption or damage to the IT structure would depend on the given situation – an assessment of the problem would be made and an appropriate action plan devised. The assessment would include consideration of students that are highly dependent on IT either through their course of study (e.g. computing courses) or for other reasons (e.g. distance learning students or students with disabilities) in order to ensure the quality of teaching and learning and maintenance of the student experience.

## Section 3: What Happens If There's Disruption to Your Studies:

2.2 OnCampus intends in any likely scenario to ensure that students are taught out on any programme they started. We believe that the structures we have in place, including our academic governance and robust financial strategy, makes it significantly unlikely that we would not be in a position to achieve that.

**If something disrupts your course or OnCampus activities, here's what we'll do to help you:**

- We'll try to keep your course running, possibly by making changes to how or where it's delivered, instead of shutting it down.

- We might need to temporarily pause your course (for example, if we need to move to a new location or get new staff), but we'll do our best to reduce any negative impact on you.
- Your classes might move online or to a different location.
- If a tutor leaves, we'll try to find a replacement as soon as possible or assign another qualified staff member.
- If we can't keep your course or module running, we'll help you transfer to another course or even another OnCampus centre, making sure your assessment scores and progress are recognised.

**If we need to make big changes to your course during the year:**

- We'll only make changes if absolutely necessary and will let you know and ask for your input.
- We'll work with you to make sure the course is still right for you.
- If you're not happy with the changes, you'll have the option to leave the course or transfer to another. We will support you in that transfer process.

**If your course is suspended, closed, or changes how it's delivered:**

- We have plans in place for these situations and will keep you informed.
- We'll try to let you finish your course ("teach out") with as little disruption as possible.
- If that's not possible, we'll help you move to another course or OnCampus centre.
- We'll make sure to consider the needs of all students, including those with different backgrounds or circumstances.
- If you haven't started your course yet, we'll let you know in time to find another suitable option.

**If our visa sponsorship is suspended or revoked:**

- We'll work with the authorities to help you finish your studies or help you switch to another sponsor if needed.

**If the OnCampus centre closes (as a result of fire, building issues, public demonstration etc):**

- We'll try to move your classes to another location, rent extra space, or use temporary buildings.
- We might change the timetable or deliver some classes online.
- We'll consult you and consider your needs before making these changes.

### **If OnCampus has to close completely:**

- We'll try to close gradually so you can finish your studies.
- If that's not possible, we'll help you transfer to another provider and may compensate you if you lose money because of the disruption.
- We might also merge with another institution to keep your studies going.

2.3 OnCampus's Business Continuity Plan covers other mitigating actions affecting business continuity, such as acts of terrorism, damage to buildings or equipment.

## **Section 4: Information about how OnCampus will review the student protection plan and communicate with students about the plan:**

4.1 The Student Protection Plan will be published on Cambridge Education Group's public website.

4.2 The Student Protection Plan will be published through the student area of Canvas, so you will always have access to it.

4.3 The Student Protection Plan will be reviewed annually to ensure that it remains relevant, effective and practical. The review will be undertaken by the Academic Board, reporting to the CEG UFP Board.

4.4 In the event of measures within the Student Protection Plan being implemented OnCampus will communicate with affected students through the most appropriate channels according to the particular situation. These channels will include, but will not be limited to, individual and group meetings with affected students, e-mail, formal letter, announcements on Canvas, and via the student representation system.

4.5 If OnCampus experiences a major incident, communication with students will be in accordance with the Business Continuity Policy. OnCampus will ensure that affected students are signposted to independent advice as appropriate to the situation.