



European School  
of Osteopathy

# Student Protection Plan

2019/20

## **Student Protection Plan for the period 2019/20**

Provider's Name: European School of Osteopathy

Provider's UKPRN: 10002344

This Student Protection Plan (SPP) is intended to provide assurance to current and future students that the European School of Osteopathy has in place appropriate arrangements to protect the quality and the continuation of study for our students.

All higher education providers are required to produce and submit an SPP as part of their registration with the Office for Students and to publish and maintain these plans as a condition of ongoing registration.

The School offers just one externally validated programme, a pre-registration Integrated Master's Degree in Osteopathy (M.Ost) accredited by the General Osteopathic Council. The M.Ost was originally validated by the University of Greenwich in 2011. This programme is being phased out in preference to a revised programme validated by Buckinghamshire New University (Bucks) in 2017. The phasing out and the phasing in will be complete by September 2020. At the time of writing, students in Yrs 1 & 2 will be following the Bucks Programme and those in Yrs 3 & 4 will be following the Greenwich Programme.

This SPP covers all students currently enrolled on or applying to the Integrated Master's Degree in Osteopathy. For the period in question, student recruitment will only be onto the Bucks validated programme as the Greenwich validated degree is being phased out, with the majority of the Greenwich students graduating by July 2020.

The following Guiding Principles have underpinned development of the SPP and align with the principles set out in the School's published Terms and Conditions of Admission which set out the contractual responsibilities of all parties.

The School:

- The School will make every effort to ensure that the Integrated Master's Programme that it offers to students is delivered as validated;
- Accepts that it may be necessary to make changes to this provision to maintain currency and validity;
- Will seek to minimise disruption to students;
- Will consider the specific impact of changes to its provision by assessing its impact on the student population, including any perceived differential impact on particular stakeholder groups, e.g. its widening participation population including those with disability;
- Will ensure compliance with requirements for all students in relation to the Act (HERA 2017) including consideration of guidance from the CMA, AND also compliance with requirement for international students who are enrolled under the School's Tier 4 Sponsor licence.
- Will endeavour at all times to keep students appropriately informed with regard to changes that may be necessary and will bring these to their attention as soon as possible;
- Will inform the Office for Students of events that require the implementation of the provisions of this Plan.

The following plan provides in Section 1 an assessment of the specific risks that the ESO faces regarding Student Protection. This assessment is reviewed annually.

In Section 2, the measures to mitigate those risks are provided.

There follows the policy in place to refund tuition fees and other relevant costs to our students and to provide compensation as required in the event we are no longer able to preserve continuity of study. Finally there is information regarding the development of this SPP, and its publication and review.

1. An assessment of the range of risks to the continuation of study for our students, how these risks may differ based on our students' needs, characteristics and circumstances, and the likelihood that those risks will crystallise.

The School operates one externally validated programme – the pre-registration Integrated Master's Degree in Osteopathy

Pre-registration osteopathic training is costly to operate requiring as it does a high staff:student ratio and the provision of a loss-making teaching clinic. Although the Integrated Master's Programme is financially self-sustaining, the School does benefit from an additional income stream (see later).

There are a number of risks that can be identified as being of potential concern for the continuation of study for our pre-registration students. Their mitigation is outlined in Section 2.

Because of this careful mitigation the overall risk that the School is unable to operate is reduced.

The identified risks to the continuation of study of our students:

- a. A reduction in student numbers either as a result of high attrition or poor recruitment (the latter due to a number of causes expanded upon below) resulting in a reduction in financial viability; (moderate risk))
- b. A reduction in the number of clinic patient numbers adversely affecting the student teaching and learning experience and ultimately in an inability to satisfy professional body requirements (see d.); (low risk))
- c. Lack of efficiency in the operation of the whole school enterprise, significantly reducing financial viability; (low risk)
- d. Loss of Recognition by the Professional Body for Osteopathy (the General Osteopathic Council (GOsC)) of our pre-registration osteopathic training courses; this recognition is referred to as Recognised Qualification (RQ) status; (moderate risk)
- e. Loss of our Tier 4 Sponsor Licence (low risk)
- f. Termination of the Memorandum of Agreement with our validating body Buckinghamshire New University; (very low risk)
- g. Loss of our additional income stream; (moderate risk)

All of these risks are multifactorial. Moderate risks are discussed in Section 2

2. The measures that we have put in place to mitigate those risks (moderate) that we consider to be reasonably likely to crystallise  
Following the presentation of the measures to mitigate the occurrence of moderate risk, there is the inclusion of statements as to the measures to be implemented should the worst case scenario pertain and the particular risk were to come to pass.

In each case the actualising of the particular risk is initially considered alone rather than supposing a coincidence of actualisation of all or some risks referred to in this section.

a. Reduction in student numbers (Moderate risk)

As indicated in Section 1, this can be due to a number of reasons including high attrition and poor recruitment.

Looking initially at the first of these, high attrition, the school has successfully countered this over many years. Over the four years of the Integrated Master's Programme, there is a 20% attrition, with the majority of the attrition occurring at the end of Yr 1. Progression between levels exceeds 90% on average. These statistics are the result of careful recruitment, a network of student support for all enrolled students, particularly disabled students (including those with learning differences) and good student teaching and learning processes, accommodation and resources (see NSS statistics).

Poor recruitment may have a number of bases including:

- Poor marketing strategy;
- Poor student teaching and learning accommodation and resources to show prospective students;
- Poor NSS statistics;
- Poor reputation;
- Competition both from other comparable professions and from other osteopathic providers.

To date the school has countered all of these challenges successfully with a well-thought through and executed marketing strategy, good resources, teaching and learning accommodation and attractive curriculum. However this success is becoming more difficult to sustain and it is evident that competition from other providers (osteopathic and non-osteopathic) is increasing. Research has also shown that the number of applicants for osteopathic pre-registration training UK wide is in decline. The reason for this is unclear and is currently under discussion by the professional groupings within osteopathy.

Probable causative factors include the negative impact of high levels of student fees (£9250/ann), falling numbers of 18-21 yr olds in the UK population and a lack of public awareness of osteopathy and its benefits. The Institute of Osteopathy (iO) (with the avowed intent of uniting, promoting, developing and supporting the osteopathic profession to improve public health and wellbeing) is taking a lead in raising public awareness and recognition of osteopathy.

As indicated within our Access and Participation Statement, we are considering the option of a BSc Honours route that would avoid the necessity for a level 7 research dissertation. This would appeal to those with learning differences but with skills in other areas. We are additionally aiming to offer a part-time mode for the Integrated Master's programme that would allow more opportunity for gainful employment whilst studying, likely to be of interest to mature students.

Also of interest to mature students the following features are to be developed by September 2021:

- Distance learning modules in knowledge subject areas within the Integrated Master's Programme;
- Stand-alone pre-entry modules to encourage return to study and building towards a qualification;
- An Access to HE Diploma Programme that would permit the recruitment of those with limited formal qualifications at least some of whom will progress to the Integrated Master's Degree in Osteopathy.

With the aim of targeting low income groups we plan by the start of Session 2019/20, to establish a bursary scheme to add to our existing student hardship fund. The bursary scheme will provide support for new undergraduate students in their first year of study with a low household income and support for students who are care leavers

In terms of outreach activity, in our recruitment strategy we already target local Grammar/High schools but we also intend to embed by September 2019 the targetting of:

- local state primary and secondary (non-grammar) schools;
- local youth clubs and other societies;
- Sports Clubs.

By so doing we would hope to broaden our catchment to include lower socio-economic groups and minority groups including BMEs and the disabled.

All of these features will help mitigate the risks of falling recruitment.

In the event that the above described approaches are insufficient to counter reduction in student numbers there are various scenarios that can be envisaged:

- 1. Isolated and infrequent poor-recruitment years:** these the school could survive using the tactics of periodic teaching staff number reduction that would entail redundancy but would be of small scale; (a poor-recruitment year would be anything less than an intake of 45 students).
- 2. Successive poor-recruitment years:** these the School could not sustain even with additional income streams and would have to consider closure using the processes and procedures as detailed under Section 3 of this submission to protect the student experience.

- b. Loss of Recognition by the Professional Body for Osteopathy (the General Osteopathic Council)(GOsC) (Moderate risk)

To mitigate this as a risk factor, the Programme Team will ensure that it can clearly demonstrate that the governance and management of the ESO and the standards and quality of the programme meet all of the requirements of the GOsC, and in particular that the Osteopathic Practice Standards are being

delivered, and that graduates of the pre-registration programme meet the practice requirements of those standards.

Key to this demonstration is good quality management as shown by:

- Mapping of all programme learning outcomes to the OPS;
- Fulfilment of any conditions associated with any GOsC reviews;
- Sustained achievement of undertakings given to the GOsC in Annual and Review reports;
- High rates of student satisfaction as a result of their overall teaching and learning experience;
- Effective academic and governance structures;
- Paying heed to the external perspective;
- Disseminating good practice;
- Annual monitoring and follow-up.

In the event that loss of recognition by the General Osteopathic Council did come to pass, the impact on the School would be immediate and far-reaching. Subsequent graduates of the pre-registration programme would no longer be able to call themselves osteopaths and practise in the United Kingdom. Recruitment would inevitably be severely adversely affected and the School would have to cease trading. In this instance the detail presented in Section 3 to this plan (Closure of the School or institutional merger) would come into operation.

c. Loss of our additional income stream (Moderate risk).

We have one additional income stream, that deriving from the operation of our international osteopathic teaching activity.

For the last 35+ yrs, the School has maintained academic links with up to 11 osteopathic educational institutions which has involved the provision by the ESO of osteopathic teaching for the students of those international schools. This has been achieved with a flying faculty and international students receiving instruction at the ESO. Latterly an internally validated International Diploma in Osteopathy (Level 6) has been awarded to graduates successfully completing the ESO international osteopathic programme.

Currently the international activity of the School contributes approx. 17.4% of the total school revenue of £2.8 million.

However factors such as Brexit , increasing autonomy of the international schools and changes to osteopathic regulation within Europe are making it increasingly difficult to sustain the School's international programme. To mitigate this, the International Programme Team is currently reviewing and enhancing its International Diploma Curriculum and has stepped-up its search for new partners. There is also the potential for the ESO to create a base within another European country.

For the future the envisaged part-time version of the Integrated Master's Programme, referred to earlier and that would be run alongside the full-time programme, will generate additional funds, together with those deriving

from the operation of the Access to HE Diploma Programme referred to under 2(a).

Were the additional income stream deriving from the international teaching activity cease totally, the School would be able to continue trading without the Integrated Master's student experience being adversely affected (assuming adequate recruitment to the latter programme). This would be achieved by means of economies in other areas and the bringing forward of other initiatives such as the Access to HE Diploma Programme the validation of which is already planned to allow for student recruitment as from September 2020. In addition the part-time version of the integrated master's programme referred to above would also be brought forward to run in parallel to the full-time mode.

It should be noted that the income stream deriving from the international activity of the school is composed of a series of income streams deriving from agreements with a number of international schools. The risk of all of these agreements ceasing in unison is low.

Finally, there is the possibility, however remote, that two or more of these risks may come to pass at one and the same time. Risk (b) alone were it to be actualised would be sufficient to precipitate school closure, therefore its combination with any other actualised risk would only underline the inevitability of closure.

A combination of the actualising of risks (a) and (c) could be survived dependent upon the severity of each of the separate actualised risks. In the worst case, the processes and procedures as listed in Section 3 would come into operation.

3. Information about the policy we have in place to refund tuition fees and other relevant costs to our students and to provide compensation where necessary in the event that we are no longer able to preserve continuity of study.

The School's Refund and Compensation Policy has been prepared with regard to the requirements of the OfS.

As indicated earlier at the time of our application to the OfS, the majority of our UK-based pre-registration students will be students of Buckinghamshire New University (Bucks). In Academic Session 2019/20, there will only remain one cohort of University of Greenwich students, those in the final year of their studies.

It is the case with both Universities that the ESO Student Protection Plan will put in place sufficient protection to deliver the financial implications of our Refund and Compensation Policy. This will be checked via "Due Diligence" as part of the Universities' Partner Approval Process. Should this fail, the relevant University is ultimately responsible for compensating the student.

## ESO Activities to help protect the student experience

Wherever possible, the School will seek to preserve continuation of study for all students who may be affected by:

- Termination of the partnership with the University;
- Programme closure;
- Closure of the School or institutional merger;

The School's expectation is that it will take all reasonable steps to teach-out academic programmes.

Where this is not possible, the School will seek to offer an alternative programme of study at one of the existing Osteopathic Educational Institutions (OEs) within the UK with whom the School has developed a Memorandum of Understanding. Thus in the unlikely event of any of the OEs ceasing to trade, one or more of the co-signatories will accept students of the failing School or Schools, allowing such students to continue their studies to completion.

The School will make every effort to support individual students and applicants through the relevant process, working with them and other stakeholders involved to make any transition as smooth as possible. This will include access to independent advice.

## Refund and Compensation

In the rare event that it is not possible to arrange acceptable alternative provision the School commits to refund fees and compensate other costs.

The School has strictly limited cash reserves, but is "asset rich" (£2.5 million). The School is therefore actively investigating opportunities to insure refund and compensation against relevant costs. We will ensure that this is in place by 1<sup>st</sup> August 2019.

#### 4. Information about how we will communicate with students about our Student Protection Plan.

This plan will be published in full on the policies section of our website and intranet where it can be accessed easily both internally and externally by current students and applicants as well as by faculty and staff of the School and other stakeholders.

The Plan will also be referenced within our Terms and Conditions of Admission as published on our website. These Terms and Conditions are accepted by the students at enrolment and reconfirmed by students at the start of each subsequent academic year on re-enrolment.

## Plan Development

The development of this SPP has involved the following groups:

- The Executive Committee that includes the Finance Directorate, and Academic Registry;
- Student Admissions;
- Marketing;



- Representatives from teaching areas;
- Student Representatives;
- Trustees.

It has also received the formal ratification of the Board of Trustees, Academic Board and the Programme Committee of the School.

#### Plan Review

Our SPP will be reviewed annually by the Policy Management Committee incorporating feedback from all of the stakeholders involved in the development of the original plan.

#### Timescale for implementing changes and other arrangements

The School commits wherever possible to provide students and applicants with a minimum of 90 days notice in the event of the planned closure of a programme or other material changes to their course.

We will inform students and other stakeholders via the intranet and website.