

Student Protection Plan

Academic Year 2019-20

Document Administration

Document Title	Student Protection Plan
Academic Year	Academic Year 2019-20
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Status	Approved
Intention	To protect the interests of students and enable them to complete their programmes in the event of a material change in circumstances (e.g. a major incident, course/College closure)
Consultation	<i>Staff:</i> through the Leadership Team and Management Briefing Group <i>Students:</i> through the Student Common Room Committee <i>External Bodies:</i> through routine monitoring by the Office for Students
Authorisation	Chair of the Kingham Hill Trust
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Introduction to the Student Protection Plan

Oak Hill College ('the College') is a theological college in North London, training men and women for ministry in the Church of England and other spheres of Christian service. Its validated programmes have been developed and are delivered and assessed by the College; they are awarded and quality assured by Middlesex University ('the University'). The Kingham Hill Trust ('the Trust') is the registered charity that owns Oak Hill College and which has contributed spiritually, financially and practically to the College's development. The Trust has delegated responsibility for the operation of the College to the College Council and to the Leadership Team. All College teaching activity is delivered from its single campus in Southgate (London N14).

The aim of this Student Protection Plan is to set out the actions that the College and the Trust will take in the event of a material change in circumstances (such as a major incident) to protect the student interest and to ensure that students are able to complete their programmes. In so doing, the College and the Trust will work together with the University, the Church of England and the Office for Students to ensure that students are able to achieve the best possible outcomes. The Plan has been designed to comply with the requirements of the Office for Students and should be read in conjunction with the College's Refunds & Compensation Policy.

Measures we will take in Specific Situations

In the tables which follow, a number of risks and changes of circumstance are identified along with the actions that the College and Trust will take in order to protect students' continuity of study should those risks/changes crystallise. In each case, we have tried to take account of differences in students' needs, characteristics and circumstances. Arrangements for students who wish to transfer to another institution to complete/continue their studies are set out towards the end of this document, along with information about how refunds may apply.

Abbreviations (used in the tables below)

ELQs	Equivalent-Level Qualifications
ILLs	Inter-Library Loans
OfS	The Office for Students
SCR	Student Common Room (Committee)
SLC	The Student Loans Company
SpLDs	Specific Learning Difficulties
TCC	Theology for Crossing Cultures
TCY	Theology & Praxis for Children's & Youth Ministry
TEI	Theological Education Institution
VLE	Virtual Learning Environment

1. Financial and Market Risks			
Risk to Continuation	Mitigating Actions	Level of Risk	Potential Severity/ Impact on Continuation
1. The College experiences a significant loss of market, leading to a sustained loss of income and ultimately a decision to close	The College will suspend admissions and will discontinue use of the University logo: applicants who have already accepted an offer will be permitted to withdraw their acceptance and will be provided with a list of alternative TEIs.	Low: The College operates in a specialist vocational area, making significant market loss unlikely. The College's finances are underwritten by the Trust, which has a clear reserves policy and assets which could be liquidated or mortgaged if the need arose	High: Students' programmes may have to be curtailed to the nearest exit point; the quality of the learning experience might be affected if there were a need to use VLE recordings for teach-out
2. The College is no longer able to meet its financial obligations and is forced to exit the higher education market	The Trust will use its reserves or, if necessary, liquidate/ mortgage Trust assets in order to cover operating costs and ensure that the College can be closed in an orderly fashion. Students will be taught out to the nearest exit point for their programme: depending on the reason for and speed of the closure, this may be done face to face or through the administration of recordings on the VLE.		
3. The Trust experiences financial failure, directly affecting the College's position			
4. The College is adversely affected by a wider economic downturn and/or by uncertainty within the higher education sector at large	The College will continue to offer bursary support to those students who (notwithstanding their own fundraising activity) find that they have a shortfall in funding because of the wider economic situation; the College will also look to expand its own income generation activity and maximise use of its facilities.	Moderate: a range of issues are creating a degree of economic uncertainty in the UK and the HE sector remains volatile	Moderate: individual students may experience increased difficulty with fundraising in an adverse economic climate

2. Collaborative and Regulatory Risks			
Risk to Continuation	Mitigating Actions	Level of Risk	Potential Severity/ Impact on Continuation
1. The University withdraws validation for the College's awards and/or gives notice that it wishes to end the partnership	Under the terms of the Partnership Agreement with the University, students who are already enrolled will be allowed to complete their programmes and will be awarded the relevant qualification. The College will suspend admissions to all University-validated programmes and will discontinue use of the University logo. The College will then seek an alternative validating body, working with the OfS if need be.	Low: the relationship with the University is a long-standing and positive one; the College is not part of the Church of England's Common Awards Scheme, but maintains a close and cordial relationship with the Church of England's Ministry Division and with individual dioceses	Low: As set out in the Partnership Agreement, current students will be supported to completion of their programmes
2. The Church of England withdraws authorisation for Ordinands to be trained for ministry at the College	The College will suspend the admission of Ordinands and will discontinue the use of wording which indicates that it is an approved training institution for the Church of England. Where an offer has been made and/or accepted, the College will contact prospective Ordinands and their sponsoring dioceses to discuss alternative training provision. Where Ordinands are already enrolled, discussions will focus on whether sponsoring dioceses are content for students to complete their awards (or an agreed exit qualification) or would prefer them to transfer.		Moderate: The impact is likely to vary depending on the wishes of each diocese: some Ordinands may need to transfer
3. The OfS suspends or de-registers the College because of a breach of one or more conditions of registration and, as a result, the College loses designation for student loan support	<p>The College will discontinue the use of any wording which indicates that it is registered with the OfS and that its courses have been designated for student loan support. The College will contact the OfS to request that students who are already in receipt of financial support be allowed to complete their courses under teach out arrangements. If this is not possible, affected students will be supported to completion through College bursaries (underwritten by reserves) and/or will be assisted in their search for alternative sources of support.</p> <p>The College will contact applicants who have already received/accepted an offer on the basis that student loan support may be available. Those who have already accepted an offer and wish to proceed will be permitted to enrol; depending on</p>	Low: the College has good governance and financial management arrangements in place and, as such, is unlikely to breach its conditions of registration. The majority of the College's students are ineligible for student loans because they hold ELQs	Low: the majority of the College's students are ineligible for student loans because they hold ELQs; as such, they are not normally dependent upon this form of funding

2. Collaborative and Regulatory Risks			
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	proximity to the start of the academic year, financial support may be offered to meet any shortfall in funding; otherwise, those holding offers will be allowed to withdraw their acceptance and will be provided with a list of alternative TEIs.		

3. Risks Concerning the College's Estate			
Risk to Continuation	Mitigating Actions	Level of Risk	Potential Severity/ Impact on Continuation
<p>In all of the situations set out below, the following mitigating actions will apply:</p> <ul style="list-style-type: none"> • Immediate actions will be taken in line with the College's Critical Incident Plan. • Wherever possible, the College will continue to deliver its programme content face to face; however, depending on the nature and extent of the loss, it may be necessary for some content to be delivered using VLE-based recordings from the most recent module run (usually the preceding academic year). Students will be kept fully informed of how content will be delivered. • Funds for additional expenditure (e.g. travel, accommodation, meals) and ultimately for the work of re-building the College will come primarily from insurance; additional funds may also be available from the Trust. 			
1. The Main House becomes unusable because of fire (or similar) or as a result of structural/other risks associated with listed building status: this assumes a consequent loss of accommodation, teaching space (Beech, Ash, Chestnut and Dogwood Rooms) and the main kitchen/dining room	<ul style="list-style-type: none"> • Those affected will be accommodated locally: depending on individual situations, this may be in hotels/B&Bs, with other on-site residents, or with local church families. • Lectures will move into the Academic Centre or locally-rented space (schools, hotels, church halls, portakabins); the timetable may be extended outside of normal hours. • Study space will devolve to the Library/other parts of the site; on-site/local students may be asked to work at home if possible to maximise the space available for others. • Administrative staff will work from temporary locations (e.g. portakabins or locally-rented space); some staff may work from home if they are not directly needed on site. • Staff and students will be asked to cater for themselves. 	Low: as determined by regular fire risk assessments and by the terms of the College's insurance	High: Although the College will make every effort to ensure that students can continue their studies, the learning experience will inevitably be affected by the loss of teaching space/other facilities

3. Risks Concerning the College's Estate			
Risk to Continuation	Mitigating Actions	Level of Risk	Potential Severity/ Impact on Continuation
2. The Academic Centre is lost because of fire (or similar): this assumes a consequent loss of teaching space (LR1, LR2, SR3 and SR4), study space and the College Library	<ul style="list-style-type: none"> • Lectures will move into the Main Building or locally-rented space (schools, hotels, church halls, portakabins); the timetable may be extended outside of normal hours. • Given the significant loss of study space, on-site/local students will be asked to work at home if possible to maximise the space available for others. • For recovery of Library stock, please see no.3 below. 	Low: as determined by regular fire risk assessments and by the terms of the College's insurance	High: Although the College will make every effort to ensure that students can continue their studies, the learning experience will inevitably be affected by the loss of teaching space/the Library
3. The College Library is destroyed because of fire (or similar): while the Library is located within the Academic Centre, the assumption here is that only the Library is destroyed	<ul style="list-style-type: none"> • A full list of holdings is maintained by the Librarian, from which the most urgently required texts can be identified using Module Narratives and book lists on the VLE. • The Latimer Collection (Main Building) will offer some duplication of stock. The College also has access to some e-resources and scans of some module-specific materials. • Otherwise, immediate replacement costs will be funded through insurance. Depending on the nature and extent of the losses, other theological libraries in the area may also be approached for short-term assistance (e.g. ILLs). • Study space in the Library will be temporarily lost; as such, on-site/local students will be asked to work at home if possible to maximise the space available for others. 	Low: as determined by regular fire risk assessments and by the terms of the College's insurance	High: Although the College will work to make good the losses as soon as possible, this will take time and will put pressure on the availability of learning resources in the short term
4. Some of the free-standing accommodation is lost because of fire (or similar)	Affected students will be allocated temporary accommodation for the remainder of the academic year (as set out under no.1); new accommodation will then be considered as part of the next cycle unless there are mitigating circumstances which mean that this needs to be done sooner.	Low: Most College accommodation consists of (semi-) detached housing and there are few blocks of flats	Low: Although there will be a degree of disruption, the College's ability to deliver its programmes will not be affected
5. Two or more of the Main House, Library, Academic	Actions will follow the pattern set out in nos. 1-4 above with respect to teaching space, study space, accommodation, meals	Low: The free-standing accommodation and	High: Although the College will make every effort to

3. Risks Concerning the College's Estate			
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Centre, and/ or free-standing accommodation are lost (e.g. major disaster)	and replacement of Library resources.	other buildings are separate from each other	ensure that students can continue their studies, the learning experience will inevitably be affected by the loss of teaching space/other facilities
6. The College network is destroyed e.g. fire in the IT room, multi-site fire, unplanned power outage (unplanned shut down/re-boot) or malware	In the event of fire/power loss in the IT Room (Main Building), the College's support contract will enable the purchase/ installation of new equipment, and IT staff will be able to restore data from back-ups in the Academic Centre. If the fire/power-loss were to be in the Academic Centre, new back-up equipment would be installed as a matter of urgency. If BOTH IT Rooms were lost, additional WiFi points would be set up to ensure that students could continue to access teaching materials through the (cloud-based) VLE while other systems and networks were restored.	Low for fire, whether single or multi-site (see nos. 1-5 above); low for malware; moderate for power outages/shut downs	Moderate: There will be a degree of disruption while equipment is replaced and data is restored, but this should be short-lived
7. The College's estate (or a significant part of it) is destroyed through an Act of Terrorism	Actions will depend on the extent of the losses (both in terms of students and staff, and in terms of damage to the physical estate). Actions will be broadly similar to the above, albeit with an increased likelihood of teach out by means of VLE recordings if losses are extensive.	Variable depending on the political situation	Variable depending on the political situation
Special Arrangements in the case of Risks Concerning the College's Estate			
<ol style="list-style-type: none"> 1. Where additional expenditure is required for students (for example, transport costs if alternative teaching space is needed offsite, or if meals are withdrawn because of damage to the Dining Room) the College will provide support to help students meet the extra costs involved: please refer to the Refunds & Compensation Policy for details. 2. Where alternative accommodation/teaching spaces are required, care will be taken to ensure that there is appropriate access for students with mobility problems or disabilities. 3. Alternative provision will be offered to those whose care responsibilities (e.g. childcare) mean that they cannot attend classes outside of normal teaching hours: for example, this may include allowing them to study by means of VLE recordings. 			

3. Risks Concerning the College's Estate			
Risk to Continuation	Mitigating Actions	Level of Risk	Potential Severity/ Impact on Continuation
4. Depending on the nature of the events, we will fund (or provide internally) counselling and support for those who need it.			

4. LEGAL AND REPUTATIONAL RISKS			
Risk to Continuation	Mitigating Actions	Level of Risk	Potential Severity/ Impact on Continuation
1. The College is prosecuted by a prospective/current student who believes that they have suffered discrimination or that reasonable adjustments have not been made for their disability	The College has a number of processes in place to prevent discrimination occurring: this includes high-quality Admissions procedures, student support structures, mitigation procedures for student assessment and good staff management. Similarly, the University and College have safeguards in place to ensure that programmes are delivered to students as advertised.	Low to moderate: failure to deliver the advertised programme(s) and/or discrimination are unlikely to occur due to a combination of mitigating factors and safeguards	Moderate to high: depending on the extent of the impact; broadly similar to the <i>Financial and Market Risks</i> table above
2. The College is prosecuted under consumer protection law because of failure to deliver the advertised programme(s)	Beyond this, the College is covered by liability insurance in accordance with the University Partnership Agreement. If required, additional legal costs would be covered by the Trust. If legal action resulted in an adverse finding and severe financial loss/reputational damage, then the mitigating actions listed under <i>Financial and Market Risks</i> might come into play.		

5. RISKS ASSOCIATED WITH A LOSS OF PERSONNEL			
Risk to Continuation	Mitigating Actions	Level of Risk	Potential Severity/ Impact on Continuation
1. Loss of the Leadership Team (or individual members of it)	<ul style="list-style-type: none"> • <i>President</i>: An Acting President will be appointed from within the College Leadership Team. • <i>College Director</i>: Teaching will be covered by other Faculty/a nominated 'reserve educator' or through VLE recordings; an Acting Director will be appointed from within the Faculty. 	Moderate for individuals	Low to moderate: depending on the teaching load carried by the person concerned

5. RISKS ASSOCIATED WITH A LOSS OF PERSONNEL			
Risk to Continuation	Mitigating Actions	Level of Risk	Potential Severity/ Impact on Continuation
	<ul style="list-style-type: none"> • <i>Director of Operations & Finance</i>: Immediate assistance will be sought from the Secretary to the Kingham Hill Trust to provide cover for financial matters; other cover will be provided by the Leadership Team. 		
2. Loss of the Faculty (e.g. loss of life at an away day/gathering)	Under the terms of the College's Contingency Plan, the University will be supplied with the following as soon as possible: student information as agreed at enrolment (contact details, the nature of any disabilities/SpLDs, and academic progress); staff details (contact information for those who remain; nominated 'reserve educators' for those who have been lost); placements (with contact details); and access information for learning resources/lecture recordings on the VLE. University and College staff will liaise with the nominated 'reserve educators' and other local TEIs to ensure that students can complete their awards face-to-face wherever possible; where this is not feasible, arrangements will be made to teach out provision using the lecture recordings captured year on year through the VLE.	Low for the Faculty together (as such gatherings are rare) but moderate for individuals	High: Although the College will ensure that students can continue to study by means of reserve educators and/or VLE-based content, the learning experience (and the learning community itself) will inevitably be affected by such a loss
3. Loss of the Support Staff (e.g. fire in the main building)	Support will be requested from the Trust to provide cover for key posts until temporary staff can be found and a formal appointments process initiated.	Low because support staff are spread out across the buildings	Low to moderate depending on the extent to which the role is directly student-facing
4. Loss of sole-dependency personnel (ill-health/death/resignation)	<p>Actions taken will depend on the role in question:</p> <ul style="list-style-type: none"> • <i>Faculty</i>: In the short term, teaching cover will be provided by other Faculty/a nominated 'reserve educator', through VLE recordings or by a combination of these. • <i>Support Staff</i>: In the short term, cover may be sought from the Trust or by means of temporary appointments. Many support staff have created work process documents which will help with the maintenance of sole-dependency roles until 	Moderate because there are several sole-dependency staff	Low to moderate: depending on the teaching load carried by the person concerned, the subject areas covered and the position(s) held

5. RISKS ASSOCIATED WITH A LOSS OF PERSONNEL			
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	such time as permanent replacements can be found.		
Special Arrangements in the case of Risks Associated with a Loss of Personnel			
<p>1. For those who chose to continue their studies under the terms of the College's Contingency Plan with the University, information about disabilities and SpLDs will be made available confidentially to the University (as agreed with students at enrolment) in order to help the Deputy Dean, the University Link Tutor and other staff to provide the appropriate support.</p> <p>2. Depending on the situation (e.g. sudden death of a staff member), we will fund (or provide internally) counselling and support.</p>			

6. PROGRAMME-RELATED RISKS			
Risk to Continuation	Mitigating Actions	Level of Risk	Potential Severity/ Impact on Continuation
The College will not normally make changes outside of the parameters of its Programme Changes Policy. However, on occasions when a major change is required, the College's aim will be to ensure that the stated Programme Learning Outcomes can still be completed satisfactorily by those who have been admitted to the programme in question.			
1. The College decides to close one of its programmes because of insufficient enrolment; because it has been superseded by other provision; or because it no longer aligns with the College mission	<p>In accordance with any agreed timeframe for teach-out of the affected programme(s), the College will suspend admissions and contact applicants to whom an offer has already been made: offers already accepted will be honoured if the prospective student wishes to enrol on an alternative programme, or on a shortened version of the affected award (e.g. a CertHE or FdA instead of a BA Hons); otherwise, those holding offers will be allowed to withdraw their acceptance and will be provided with a list of alternative TEIs.</p> <p>All currently registered students will be notified immediately. If they wish to remain at the College, they will be offered the choice of completing their studies through teach-out arrangements or transferring to any new provision.</p>	Low because this kind of decision would normally be taken well in advance (usually as part of a programme review cycle)	Low because this kind of decision would normally be taken well in advance, allowing sufficient time to plan appropriate teach-out arrangements

6. PROGRAMME-RELATED RISKS			
Risk to Continuation	Mitigating Actions	Level of Risk	Potential Severity/ Impact on Continuation
2. The College is required to make a material change to one of its programmes because of a change in regulatory, validation or accreditation requirements	Changes will be limited to the minimum necessary to comply with new requirements. Where appropriate, the College will suspend admissions until such time as amended programme information becomes available. The admissions team will contact applicants to whom an offer has already been made: offers already accepted will be honoured if the prospective student wishes to proceed on the amended programme; otherwise, those who hold offers will be allowed to withdraw their acceptance and will be provided with a list of alternative TEIs. Currently registered students will be notified of the changes and will be consulted with as far as possible. If they wish to continue their studies, they will be supported as normal through to completion.	Low because the College only offers programmes in one (fairly stable) discipline	Variable depending on the nature and extent of the change
3. The College is no longer able to provide material elements of particular programmes because of loss of key staff (especially in sole-dependency aspects of the programmes such as TCY, TCC)	Where appropriate, the College will suspend admissions until such time as information about an amended programme or about teach out arrangements becomes available. The admissions team will contact applicants to whom an offer has already been made: offers already accepted will be honoured if the prospective student wishes to proceed on the amended programme; otherwise, those who hold offers will be allowed to withdraw their acceptance and will be provided with a list of alternative TEIs. Currently registered students will be notified immediately and will be consulted with as far as possible. If they wish to continue their studies, they will be supported to completion of their award through a combination of the mechanisms outlined under no.4 in Table 5 (contingent upon the precise circumstances).	Moderate: most modules could be taught by multiple staff but some have unique tutors	High in the affected areas but moderate in the context of programme delivery as a whole

Arrangements for Transfer

If, in any of the above scenarios, an individual student wishes to transfer to another institution to complete/continue their studies, the College will facilitate this by providing credit/achievement information and liaising with alternative TEIs. The balance of tuition fee and accommodation costs will be refunded at the College's discretion and in line with its Refunds & Compensation Policy: depending on individual circumstances, funds may be re-paid directly to the student, to the Student Loans Company (SLC) and/or to any third party sponsors such as the Church of England. Full details of how refunds will be calculated and how payments will be made can be found in the Refunds & Compensation Policy. Further information about the College's arrangements for transferring students may be found in the Student Transfer Policy.

Special Arrangements in the Case of Student Transfers

1. If a student chooses to transfer to another institution to complete their studies, particular attention will be paid to support for those with mobility issues/physical disabilities, and also for those with relevant SpLDs.
2. Where students are in receipt of student loan support, advice will be provided and arrangements will be made to enter a Change of Circumstance request with SLC, ensuring that funds are transferred to the receiving institution at the appropriate time.
3. In determining refunds and/or financial assistance, we will take account of students whose maintenance costs will increase through needing to move (accommodation), travel further to reach their new place of study, or put in place additional childcare. Please refer to the Refunds & Compensation Policy for more details.

Communication with College Staff and Students

1. Routine Communication

- The Student Protection Plan and the Refunds & Compensation Policy are subject to annual review, as part of which they are discussed with staff (through the Leadership Team and Management Briefing Group) and with students (through the Student Common Room Committee). The aim is to ensure that risks remain current and mitigations feasible in the light of changing circumstances.
- Once the Student Protection Plan and Refunds Policy have been approved, both internally and by the Chair of the Kingham Hill Trust, both documents are published on the College website and drawn to the attention of staff, students and applicants. They are also shared with external bodies as appropriate, for example with Middlesex University.

2. Communication in the Event of Implementation

Should an element of the Student Protection Plan need to be implemented (because one of the risks has crystallised), the following actions will be taken by the College:

- A communication plan will be drawn up, the detail of which will be determined by the nature of the problem. In emergency situations, the communication plan will be informed by the College's Critical Incident Plan; in all other circumstances, the plan will be prepared by the Communication Department, working with other relevant staff.
- As circumstances allow, appropriate members of the Student Common Room (SCR) Committee will be fully involved in discussion around the implementation of the Plan and communication of any required actions: depending on the situation this may include, amongst others, the Senior Student, the SCR Secretary, the Student Academic Representative, the Part-Time Student Representative and the Welfare/Diversity Representative.
- Depending on the situation, individual students will be supported and advised by their personal tutors, programme directors and senior administrative staff. Where traumatic events have taken place, the Director of Pastoral Care will work with personal tutors and other members of Faculty to provide additional support. Students who have declared a disability/SpLD will be supported by the Disabilities Officer and (with their permission) by other staff as required.
- With respect to College closure, students will be informed as soon as possible: in line with the Trust's reserves policy, three months' notice will be given as an absolute minimum.
- With respect to programme closure or a material change, students will be informed of the situation as early as possible in line with the Programme Changes Policy and the College's agreements with the University.
- Students who wish to make a complaint about the way in which the Plan has been implemented will be encouraged to follow the College's normal Complaints & Grievance Procedures (as printed in the Regulations & Procedures Handbook and published on the VLE under *Academic Life/Policies*); depending on the precise nature of the complaint, students may also have recourse to the complaints procedures of the University and the Office of the Independent Adjudicator once all College procedures have been exhausted.

Other Relevant Documentation

Contingency Plan (with the University)	Specifies how courses can be taught out using VLE resources (past and present as required) and reserve educators
Partnership Agreement (with the University)	Specifies the minimum length of time required for either institution to dissolve the partnership
Memoranda of Cooperation (with the University)	Specify the College's and University's roles and responsibilities within the collaborative relationship as regards the awards
Critical Incident Plan (Oak Hill)	Sets out actions and business continuity measures in the event of critical incidents (such as a major fire)
Programme Changes Policy (Oak Hill)	Sets out under what circumstances modules, programmes and regulations may be changed, and the processes for doing so
Refunds & Compensation Policy (Oak Hill)	Explains the circumstances in which refunds will be given as well as when compensation will be considered
Student Transfer Policy (Oak Hill)	Sets out how the College will facilitate the transfer of students from Oak Hill to another provider (or vice versa)
Complaints & Grievance Procedures (Oak Hill)	Explains how students may make a complaint about particular aspects of their College experience