

Student protection plan

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Provider's UKPRN: 10003678

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Student Protection Plan

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

The Higher Education and Research Act 2017 requires all higher education institutions who are registered with the Office for Students (OfS) to publish and maintain a Student Protection Plan. The purpose of this Plan is to ensure that students' interests are protected and that, as far as possible, their ability to continue studying is preserved if the risks identified in the Plan materialise.

The University enjoys strong academic and financial health. However, there may be occasions when changes have to be made to ensure that these strengths are maintained.

Risks

The risks identified and outlined within this plan have been considered within the University's Risk Management Framework (RMF).

Circumstances that might create a risk to the continuation of studies are (but are not limited to):

Closure of the University

The risk that the University will need to close is **low**. This is because of the following mitigations:

- We have robust financial planning processes to ensure that we maintain a strong financial position. Our financial strategy is focussed upon the generation of a suitable surplus each year and the maintenance of sufficient net cash reserves to achieve our strategic objectives.
- We have a strong academic performance. We are rated "Gold" in the Teaching Excellence Framework across all three categories – the only university in London to achieve this accolade.
- We have a robust framework for both risk management and business continuity. Key risks to the University are reported and highlighted through this process and mitigating actions are agreed and implemented in response to any emerging issues.

Closure of Part of the Campus or a University Site

The risk that the University will need to close part of its campus or a site in a way that will prevent students from continuing their studies is **low**. This is because:

- We are investing significant funds in our estate to ensure that buildings remain fit-for-purpose and offer a modern, high-quality environment for students.
- We have business continuity plans. These outline how we will respond to and tackle any disasters or emergencies that may result in a denial of access to our key buildings and facilities.
- The University is located across four sites. This ensures that the university is able to transfer activity to an alternative site if required.

Closure of Courses

We periodically review our courses to ensure that they continue to be dynamic, innovative, and meet the need for future skills. If, following review, it was decided to close a course then, in most instances, the University will “teach-out” existing students to ensure that they are able to complete their programmes.

The risk that the closure of courses will prevent students from continuing their studies is **low**. This is because:

- All decisions that may pose a risk to students’ continuation of studies will be subject to careful review. The review will identify and address implications for students.
- Our annual monitoring processes explicitly scrutinises performance data, enabling early intervention if risks to the sustainability of courses are identified.

Loss of Degree Awarding Powers

The risk that the University will lose its degree awarding powers is **low**. This is because:

- We maintain high academic standards and strong quality assurance processes that adhere to the expectations of external agencies.
- Staff are supported and expected to develop, disseminate, and incorporate best pedagogic practice in an engaging, relevant, and challenging curriculum.
- We invest in the professional development of our academic and professional services staff, for example by supporting staff to engage in continuous professional development and to achieve professional accreditation.

Removal of Professional, Statutory and Regulatory Body Accreditation

We have robust mechanisms in place to maintain professional, statutory, and regulatory body (PSRB) accreditations. However, the removal of PSRB accreditation is not always the consequence of failing to attain required standards. We may, from time to time, choose to pursue new accreditations and/or withdraw from existing accreditations to better align with our strategic goals. The risk that the removal of PSRB accreditation will prevent students from continuing their studies or from entering their chosen career is **low**. This is because:

- PSRB accreditation is not always required to enable a qualification to be awarded or for a student to enter a particular career. If we change or withdraw from an accreditation, then the needs and aspirations of students will be considered.
- We liaise and work closely with PSRBs to ensure that our accredited courses reflect the required standards for PSRB accreditation.
- We ensure that our courses comply with existing PSRB standards and have robust monitoring systems to ensure that we reflect new accreditation requirements in our academic planning.
- New, amended, and reviewed PSRB accreditations are overseen by our Quality Assurance and Enhancement Division, which can make reports to the Education Committee if any risks are apparent.

Suspension or Loss of UKVI Tier 4 Sponsor Licence

The risk that the University will lose its UKVI Tier 4 Sponsor licence and that this will prevent students from continuing their studies is **low**. This is because:

- We have designated roles with specific responsibility for ensuring proactive compliance with Home Office requirements.
- We have a robust process for both recording attendance and following up on non-attendance in place, to ensure that students are supported appropriately with their studies and attend as required.

Loss of Key Staff

The risk that the loss of key staff will prevent students from completing their studies is **low**. This is because:

- Our People Plan is a key element of our Town House Strategy and emphasises the importance of recruiting and retaining high-quality staff and further developing their skills, knowledge, and experience.
- We design our courses to be taught by integrated teams of staff.
- Our course offer is developed to ensure that course teams have adequate staff capacity and expertise to support the range of subjects that we offer.
- Potential over-reliance upon individual members of staff is explicitly considered and addressed as part of our periodic review process.
- Research student supervision is conducted by a first and second supervisor and sometimes by a third supervisor, to ensure continuity if a supervisor leaves the University.

Changes Involving Partner Institutions

The risk that changes at partner institutions might impede students from continuing their studies is assessed as **low to medium risk** across our entire portfolio of partnerships.

To mitigate and manage these risks, we have implemented the following measures:

- We undertake robust due diligence of all potential partners and only engage with partnerships who we deem not to be at risk.
- We undertake comprehensive due diligence of the financial and academic health of our potential partners and their regulatory status before we enter any partnerships.
- We have robust legal contracts with our partners that clearly stipulate respective responsibilities, and we liaise closely to ensure that relationships are effective.
- We undertake annual and periodic review of our partnerships to identify and take action to address any risks to the student experience and to academic standards and quality, including the ongoing financial health of the partner.
- We have predetermined arrangements in place to ensure that students are able to complete their studies if the partnership draws to a natural conclusion.
- We have contingency plans with our partners to help us to manage unforeseen changes.

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

We do not consider any of the risks identified above to be reasonably likely to crystallise in the immediate future. However, of the risks identified above, we feel that the following have the most likelihood of crystallising and have identified the following mitigating actions to address them:

Closure of Courses

We periodically review our courses to ensure that they continue to be dynamic, innovative, and meet future skills needs. If, following this review, it was decided to close a course then, in most instances, the University will “teach-out” existing students to ensure that they are able to complete their programmes. If this is not possible then we will offer the students concerned, where practical, opportunities that will include:

- (i) Transferring to other courses offered by the University.
- (ii) Studying a modified version of the same course.
- (iii) Studying via distance learning to complete their course if appropriate.

Each instance will be treated on a case-by-case basis and the University will work proactively to identify and secure other feasible solutions that work best for impacted students.

In the rare event that the University is unable to provide for continuation of studies then it will:

- (i) Facilitate opportunities for impacted students to continue studying at another provider; and/or
- (ii) Provide impacted students with proportionate and reasonable refunds, reimbursement and compensation that place them in the equivalent financial position that they would have experienced if the course had not closed, or the study location had not closed for that course.

These obligations also extend to apprenticeship students if non-continuation of study is the direct consequence of decisions or actions taken by the University.

Removal of Professional, Statutory and Regulatory Body Accreditation

If we lose or withdraw from PSRB accreditation and this leads to students being unable to continue their studies then we will offer the students concerned, where practical, opportunities that may include:

- Transferring to other courses offered by the University.
- Studying a modified version of the same course.
- Providing assistance to transfer to a different provider who holds the relevant accreditation.

Each instance will be treated on a case-by-case basis, and we will work proactively to identify and secure other feasible solutions that work best for impacted students.

Suspension or Loss of Tier 4 Sponsor Licence

In the event of suspension or the loss of our Tier 4 Sponsor Licence we will:

- Subject to UKVI consent, allow enrolled students to complete their year of study.
- Subject to UKVI consent, allow students already in receipt of a visa based upon an allocated Confirmation of Acceptance for Study from the University to enrol and commence their course.
- Offer students who have not commenced their travel to the University, the opportunity to postpone their application pending the resolution of the suspension.
- Provide assistance to impacted students to help them to switch to an alternative sponsor if they are unable to continue their studies with us.

Loss of Key Staff

In the event that key staff leave the University or are otherwise unavailable to teach or supervise then we will provide an appropriately skilled and experienced member of staff to teach or supervise either on a permanent or interim basis.

Changes Involving Partner Institutions

We are committed to implementing consistent and equitable mitigation measures to safeguard the interests of all students, regardless of whether they are enrolled under a franchise, accreditation or transnational education (TNE) arrangement with a partner institution.

A contingency plan is required as part of the initial due diligence evidence for any new partnership proposal. These contingency plans identify actions to be taken if students are unable to complete their course. These include transfer to another partner; delivery by university staff at the partner's premises; hiring of staff to deliver the provision; or transfer to the same or a similar course at the University.

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

Refunds and Compensation for Non-Continuation of Study

Our Refund and Compensation Policy can be found [here](#).

Delivery of the Financial Implications of the Refund and Compensation Policy

The University maintains sufficient cash reserves, which it currently deems adequate to provide any refunds, reimbursement and compensation that might be necessary. This position will be reviewed in the light of any changes to the University's risk profile that may have implications for continuation of studies or if we implement changes to the way that we manage our cash that might impact upon our cash reserves.

Complaints

Our Student Complaints Procedure is set out on our website and intranet and sets out how students may complain about any aspect of their interaction with the University, including if they wish to complain about how we implement our Student Protection Plan.

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

We will publicise our Student Protection Plan to current and future students by publishing it on our website on our policies and regulations page.

We will ensure that staff are aware of the implications of our Student Protection Plan when course changes are proposed.

We are committed to communicating any changes to students as early as possible, with clear information and options. This will include offering impacted students:

- As much advance notice as is reasonably practicable possible of any changes to their courses that may affect their ability to continue their studies.
- Opportunities for consultation and comment on any proposals.
- Opportunities to receive information, advice, and guidance to consider alternative options that meet their interests and needs.

All students who are unable to continue their studies as a consequence of a course closure will be explicitly signposted to the Student Protection Plan.

Revising this Plan

The Executive Director for Students and the University Secretary will jointly formally review the Student Protection Plan annually with support from the Chief Risk Officer and the Head of Quality Assurance and Enhancement to identify any required revisions, or sooner if changes to our risk profile or the experience of operating the Plan make this necessary. Any proposed revisions will normally be considered and approved by the Academic Council, upon recommendation from the Education Committee. Both the Academic Council and the Education Committee include Students' Union representation.

In addition, we align the Student Protection Plan with consideration of our Strategic Risk Register and as part of this process the Student Protection Plan is considered annually by the Risk and Business Continuity Committee.

Our Strategic Risk Register is regularly reviewed in detail by the Risk and Business Continuity Committee; the Senior Leadership Team; and the Audit and Risk Assurance Committee. If at any of these review points, there is any alteration to the University's risk profile that requires the Student Protection Plan to be reviewed and potentially revised then this will be actioned.

The University's Senior Leadership Team will also consider whether amendments are necessary to the Plan when considering any specific changes or proposals that may have implications for continuation of studies.