

## Student Protection Plan for 2019/20

### ***What is the Student Protection Plan?***

This is the University of Greenwich's Student Protection Plan for 2019/20. The Plan has been approved by the University's Governing Body and by the [Office for Students](#) (OfS) as required by the OfS Regulatory Framework, which applies to the University as a registered higher education provider. Details of the University's registration are available in the OfS's [Register of Providers](#).

The Student Protection Plan sets out the University's arrangements for protecting the quality and continuity of study for its students. The Plan is tailored to the University's specific circumstances and is based on an assessment of the extent of the risks to the continuation of study for our students. It will be reviewed annually by the Governing Body.

Enquiries about this Student Protection Plan should be directed to the University Secretary's Office: [universitysecretary@greenwich.ac.uk](mailto:universitysecretary@greenwich.ac.uk).

The Student Protection Plan is structured according to a template provided by the Office for Students in 2018 during the initial registration process.

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

The University of Greenwich has assessed the following as potential risks to students' continuation of studies:

### **Closure of the University (very low risk)**

The risk that the University as a whole becomes unable to operate is considered to be very low, because the institution has historically run its accounts at a surplus and has significant reserves to draw on if required. The University's [2017/18 financial statements](#) indicate that the University and its subsidiaries generated a £3.3m surplus in 2017/18, equating to a margin of 2% on total income, and had total net assets of £100m at the financial year end. In 2018, the University undertook a cost reduction exercise to address projected falls in revenue and to ensure that the University's financial position will continue to be sound. The University's financial management information and financial forecasts are regularly reviewed by the Finance Committee and the University Governing Body to enable any corrective action to be initiated immediately, in the event of a deterioration in the University's financial position. The Finance Committee and the Audit and Risk Committee actively oversee measures to ensure that the University achieves efficiency and value for money in its operations.

The University has an Emergency Response Plan, approved by senior committees and regularly reviewed by senior management. The University's [risk management framework](#) ensures that risks

to the institution's sustainability are identified and appropriate risk controls and mitigations put in place. The Risk Management Policy, institutional Statement of Risk Appetite and the Corporate Risk Register are regularly reviewed by the Audit and Risk Committee and the Governing Body.

#### **Loss of degree awarding powers (very low risk)**

The University was awarded indefinite degree awarding powers under the Further and Higher Education Act 1992. The Office for Students (OfS) Regulatory Framework gives the OfS the power to revoke a provider's authorisation to grant degrees. The risk of this to the University of Greenwich is considered to be very low, as the University intends to fully comply with the OfS Regulatory Framework.

The University actively monitors changes in the OfS's requirements. Regulatory returns required by the OfS are approved by the University's Governing Body following scrutiny by the appropriate committee (Finance Committee, Audit and Risk Committee or the Academic Council), and the University's executive has agreed a framework to ensure that 'reportable events' are reported to the OfS as required by the Regulatory Framework.

#### **Loss of the University's Tier 4 sponsor licence (low risk)**

The University acts as a Tier 4 Visa sponsor for students coming to study with us from outside the EU. There is a risk for any provider that UK Visas and Immigration (UKVI) could withdraw our licence to sponsor students on a Tier 4 Visa. This would mean that these students would not be able to continue their studies with us and would lose their right to remain in the UK unless another institution were able to provide sponsorship.

The risk of us losing our Tier 4 Sponsor licence is considered to be low, because we have a low visa refusal rate for our students, and as a Premium Licence holder with the UKVI, we are able to analyse statistics carefully for our Tier 4 students to ensure that we remain within UKVI's requirements. The University passed its Basic Compliance Assessment in September 2018 to renew its Tier 4 licence with all indicators within the UKVI's thresholds. All aspects of Tier 4 visa operations are considered at a UKVI Operations Group reporting to the Provost's Group, with any changes to policy approved by the Provost's Group and the Academic Council.

#### **Loss of PSRB accreditation for a programme (low risk)**

Some of our programmes of study are accredited by a Professional, Statutory or Regulatory Body (PSRB) and successful completion of some of these programmes will lead to chartered status with the relevant PSRB. It is possible that a PSRB may withdraw its accreditation for one or more of our programmes of study, meaning that students completing the programme would no longer be awarded chartered status.

The risk of the University losing accreditation for one of these programmes is considered to be low. We engage closely with all PSRBs and regularly assess our compliance with requirements for teaching and assessment standards and other key practices.

## **Closure of a collaborative partnership (moderate risk)**

The University has collaborative teaching arrangements (sometimes called 'sub-contracting' or 'franchise' arrangements) with a range of partner colleges inside and outside the UK. A list of our collaborations can be found on our website: <https://www.gre.ac.uk/about-us/partner/pcn> (UK partnerships) and <http://www.gre.ac.uk/collaborations/current> (international partnerships).

There is a risk that one or more of our partners may cease operating, or may cease offering one or more of our franchised programmes of study. These programmes are taught across a wide geographic area and some are taught outside the UK. If a partner were to cease operating or cease offering a programme of study, and for unforeseen circumstances it were not possible to teach out the programme to students already registered, any alternative programme offered to students (at another partner institution or at the University) might be taught some distance away. This would mean increased travel time and travel costs for those students affected.

The risk to students' continuity of study from the closure of collaborative partnerships is considered to be moderate. In most cases, there will be an equivalent programme to the collaborative programme taught at the University of Greenwich, providing the opportunity for partner students to be taught at the University if necessary. We operate a robust approval process for new partnerships, with all partnership proposals subject to approval by the University's Partnership Scrutiny Panel and the Academic Planning Committee. We carry out a regular programme of reviews for all our collaborative partners, including an annual review of each partner's provision, and the reappraisal of partnerships every five years (or earlier, e.g. if there are concerns about the partner).

Each partner college has both a Financial Memorandum and a Memorandum of Agreement, which outlines which courses will be offered under QA/Franchised arrangements and also details termination procedures should a partner college wish to cease offering a course. Tier 4 provision and any associated risks are closely monitored by the University, both via the Partnership Scrutiny Panel and via a Tier 4 monitoring survey that partner colleges complete on a bi-annual basis.

Regular monitoring meetings, application reporting and communication takes place between the Partnerships Manager and the Partner Colleges. Support in terms of Away Days and Strategic Planning Meetings also occur on an annual and bi-annual basis.

Additionally, for international partner colleges, regular risk assessments are undertaken assessing recent changes in the operating environment (political, financial and regulatory). As with our UK partner colleges, contracts for international partners detail arrangements for planned teaching-out of existing students. For new validated programmes approved for delivery for the 2019/20 academic year, the provision of a risk assessment and exit plan, dealing with catastrophic circumstances where teaching out is not possible at the existing site (e.g. due to unplanned closure of an overseas campus), is now a mandatory component of the approval procedure. For existing overseas partners and programmes, the University has a time-limited plan in place for these exit plans to be produced.

A [Higher Education Review of the University of Greenwich](#) by the Quality Assurance Agency for Higher Education (QAA) in 2015 included a review of the University's management of collaborative

provision, and found that the University met UK expectations in all of the indicators used by the QAA. The review identified as an area of good practice the “risk-based approach embedded in the work of the Partnership Scrutiny Panel, link tutors and annual monitoring activity that strengthens the management and oversight of partnership provision”.

#### **Changes to supervision arrangements for PhD students (moderate risk)**

The research being undertaken by our postgraduate research students is unique to their research project. Due to the bespoke nature of some of these projects, in exceptional cases, suitable supervision may be best provided by one particular member of academic staff at the University. In these cases, there is a risk that if the academic member of staff was no longer employed by the University, it would not be possible to reassign the student to another suitable supervisor and the student might need to transfer to another institution. This might involve increased travel time and costs for supervision meetings. The risk is considered to be moderate, as it would normally be possible to arrange suitable alternative supervision for research students within the University.

#### **Relocation of a programme (moderate risk)**

The University operates three campuses (at Greenwich and Avery Hill in London and at Medway in Kent) and keeps the configuration of its estate under regular review, as part of its academic and financial planning. In some cases, this may mean that a programme is transferred from one campus to another in the interests of efficiency and sustainability, or to provide improved facilities for students. This may mean that some students incur unanticipated travel costs and additional travel time as a result of the move of their programme to a different location, e.g. where students have chosen accommodation due to its proximity to the campus where their programme was originally taught. There could be additional implications for students who have disabilities that make travel between locations difficult.

The risk to students’ continuity of study is considered to be moderate, as two of the University’s campuses (Greenwich and Avery Hill) are in relatively close proximity, and a regular bus service is provided by the University between the three campuses.

#### **Closure of a programme (moderate risk)**

The University keeps its portfolio of programmes under regular review, and may occasionally discontinue a programme for reasons of academic or financial sustainability or as part of ensuring the currency of our offering. The closure of all programmes is subject to approval by the University’s Academic Planning Committee and must include consideration of how the interests of current and prospective students are protected.

The risk to students’ continuity of study is considered to be moderate, as the University’s normal practice is to ‘teach out’ programmes which are closing to ensure that students receive the degree that they registered for.

#### **Changes to a programme (moderate risk)**

The University keeps its programmes under regular review, and will make changes to programmes (e.g. to their structure or content) to ensure the currency of our offering and to ensure that programmes are academically and financially sustainable. Many changes are made in response to

feedback from students, and are intended to improve the academic experience of students and students' academic outcomes. Changes to programmes require formal approval under the University's academic quality assurance procedures.

The risk to students' continuity of studies is considered to be moderate. The University will take all reasonable steps to minimise the impact of any material changes to programmes on students' continuity of study (e.g. by phasing in changes or implementing changes on a 'no detriment' basis), and will consult with students about any material changes to programmes which might affect them. As indicated, many changes are intended to be beneficial to students and to improve student outcomes.

***The measures that we have put in place to mitigate those risks that we consider to be reasonably likely to crystallise***

This section covers the measures which we have put in place to mitigate the risks which we have identified as 'moderate' in the section above, on the basis that these are risks with a greater likelihood of being crystallised.

#### **Closure of a collaborative partnership (moderate risk)**

Where a franchised programme or set of programmes can no longer be delivered by a collaborative partner, we would offer to deliver the same programme of study where it is offered by the University or one of our other collaborative partners. This relocation may involve inconvenience to some students, for example increased travel time and costs. The University will compensate students for reasonable additional travel costs incurred as a result of the transfer of their programme, with claims for compensation to be considered on an individual basis.

In the rare situations where a franchised programme or set of programmes can no longer be delivered by a collaborative partner and it is not possible to transfer the student to the same programme of study at the University or one of its other partners, the University will assist the student in transferring to a different programme at the University or to a different programme at another provider. Any compensation will be as set out in section 5.5 of the University's [Charging and Refund Policy for 2019/20](#) (undergraduate and postgraduate taught students).

In the exceptional circumstance that a franchised programme is closed and the University is not able to preserve continuation of study, compensation arrangements will be as set out section 5.7 of the University's [Charging and Refund Policy for 2019/20](#) (undergraduate and postgraduate taught students).

#### **Changes to supervision arrangements for PhD students (moderate risk)**

Where a Postgraduate Research Student's supervisor leaves the University, we will normally reassign the student to a suitable alternative supervisor from within the University.

As specified in the University's [Postgraduate Research Tuition Fee Charging and Refund Policy 2019/2020](#), in the exceptional circumstance that no suitable alternative supervision can be found within the University, we will work with the student to identify the most suitable replacement supervisor at another provider. The University will refund all tuition fees for periods of study that are not taken into account by the new provider and will provide compensation for reasonably incurred additional maintenance or travel costs that the student cannot reasonably avoid as a result of their transfer to the other provider, with claims for compensation to be considered on an individual basis. Where the Postgraduate Research Student received a bursary/scholarship from the University, the University will honour the full amount of the bursary/scholarship (for so long as the student continues under the replacement programme) subject to the student continuing to meet the University's eligibility criteria for the bursary/scholarship.

### **Relocation of a programme (moderate risk)**

Wherever possible before transferring a programme to a different campus, the University will consult with students and discuss measures to mitigate the impact of any transfer (it may not be possible to do this in all cases, for example, in emergency situations).

As indicated, the University provides a regular bus service between its three campuses, two of which (Greenwich and Avery Hill) are in close proximity. Compensation arrangements in the event that a student incurs additional travel costs as a result of the relocation of their programme are covered by our [Charging and Refund Policy for 2019/20](#) (undergraduate and postgraduate taught students).

### **Closure of a programme (moderate risk)**

In the event that the University is unable to continue offering a programme of study for any reason, wherever possible we will 'teach out' the programme, ensuring that students who already registered complete their studies with us.

Should this not be possible, we will seek to transfer students to another programme at the University, or to engage with other providers and aim to find places on equivalent or similar programmes of study. Efforts would be dependent on the nature of the programme and whether other providers have capacity; there is therefore no guarantee that we would be able to place all affected students with other providers. Compensation arrangements in the event the closure of a programme are covered by our [Charging and Refund Policy for 2019/20](#) (undergraduate and postgraduate taught students).

### **Changes to a programme (moderate risk)**

As indicated, the University will take all reasonable steps to minimise the impact of any material changes to programmes on students' continuity of study (e.g. by phasing in changes or implementing changes on a 'no detriment' basis), and will consult with students about any material changes to programmes which might affect them.

As part of a review of its programme approval and modification process, the University has approved [guidance for staff](#) on what types of changes to programmes have implications for

compliance with the Competition and Markets Authority's guidance for universities and when consultation with students is required.

***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 continuation of study***

Our Charging and Refund Policies for 2019/20 are available at <https://docs.gre.ac.uk/rep/sas/charging-and-refund-policy>. There are separate policies for undergraduate and postgraduate taught students, and postgraduate research students.

As indicated, the University had total net assets of £100m as at 31 July 2018. We believe that our reserves would be sufficient to provide refunds and compensation for the students for whom we have identified an increased risk of non-continuation of study.

***Information about how we will communicate with students about our Student Protection Plan***

We will communicate our Student Protection Plan to current and future students by publishing it on our website, by signposting the Student Protection Plan when offering applicants a place of study, and by linking to the plan in our students' programme handbooks.

We will communicate the Student Protection Plan to staff by all-staff emails and the staff e-newsletter. We will ensure that staff are aware of the implications of our Student Protection Plan when they propose programme or course changes by linking to the plan from our quality assurance procedures and programme and course change guidance.

Our original Student Protection Plan was developed by a senior management working group that included representation from the [Greenwich Students' Union](#). The student protection plan is reviewed annually and the Students' Union is consulted on any revisions. The Student Protection for 2019/20 was approved by the University's Academic Council and the Governing Body, both of which include representation from the Students' Union.

The Student Protection Plan covers a range of potential risks to students' continuity of study and what the University will do in the event that a risk crystallises. How we will communicate and consult with students will depend on the nature of the situation in which the Student Protection Plan has to be implemented, so it is not possible to be specific in advance. The overarching principle is that, wherever possible, we will consult with students at the earliest opportunity to ensure that students are fully informed and can provide their views. We will normally do so through the Greenwich Students' Union (which is supported by the University to provide students with independent advice and representation), and through existing mechanisms that we use to involve

students in their teaching and learning, such as student representatives on programme committees.

**Approved by: Governing Body, 27 June 2019**

**Date of next review: June 2020**