

# **Student Protection Plan**

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1.3	June 2021	Amendment to ensure the Student Protection Plan addresses collaborative provision arrangements.	Richard Reger (Head of Governance)	Approved by OfS



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### **Section 1: Introduction**

#### 1.1 What is a Student Protection Plan?

This Student Protection Plan sets out the measures we have put in place to protect you as our student should a risk to the continuation of your studies arise, such as the closure of a course, the campus or the University. All higher education providers registered with the Office for Students (OfS) are required to have a Student Protection Plan in place that is approved by the OfS. The purpose of the plan is to ensure that you can continue and complete your studies, or that you can be compensated if this is not possible. Its purpose is also to inform you of potential risks to the continuation of your studies, and to explain how we will mitigate those risks to protect your interests as our student.

Our student protection plan explains:

- What kinds of risks there may be to the continuation of your studies;
- How likely these risks are to occur;
- What we have done and will continue to do to reduce the likelihood of these risks occurring;
- What we'll do if any of these risks do occur and could impact your studies;
- Our policies on refunds and compensation;
- How we will communicate with you if risks occur that could impact your studies;
- What information you will be able to access and how you will be supported in making a decision about your options; and
- How you can make a complaint if you think we haven't followed our policies in the way we have handled the protection of your interests as our student.

### 1.2 Who is covered by our Student Protection Plan?

The measures contained in this plan apply to all students registered at Regent's University London\* and studying on courses that lead to a higher education qualification or credit. This includes registered undergraduate and postgraduate taught students and postgraduate research students. If your programme of study is covered by this Plan and you go on a study period abroad, the Plan will not cover you for any changes that take place at the overseas provider. However, we will put measures in place to enable you to continue your studies if there is a risk of disruption that materialises in relation to an overseas provider (see 3.5).

\* A student is registered at a provider if the provider has full contractual responsibility to the student for the provision of educational services.

If you are an applicant who has accepted an offer to study at Regent's University London but you have not yet enrolled at the University we will notify you if the Plan is triggered and if there are any risks that will likely affect you. In such cases, we would inform you of any changes and would try to minimise any impact by offering suitable alternative arrangements. For example, we would help you to find an alternative programme or provider, or we would help you to



defer your place for a year, or transfer to another programme at Regent's University London, if this were appropriate.

The measures contained in this Plan are in addition to the protections you have under consumer protection law and do not affect your consumer rights.

### **Section 2: Assessment of Risks**

In this section we have set out a range of risks that could occur and, that if they did occur, would be likely to affect the continuation of your studies. We have made an assessment of the likelihood and impact of these risks occurring in the next academic year. Our assessment is based on the risks being judged on a scale from 'very low', 'low', 'medium', 'high', to 'very high'. Considering these risks in a careful, responsive and timely way, allows us to put robust plans in to mitigate any risks to the continuation of your studies.

### 2.1 Learning and teaching risks

### Closure or suspension of an individual programme. Current risk: low to medium

Regent's has a very cosmopolitan student body, with over 80% coming from outside the UK. Regent's is also a small university, with many students taught in small groups. There is a risk that some students may be unwilling or unable to travel due to coronavirus travel restrictions either in the UK or in their local area. To mitigate the risk of students being unable to return to the UK in the Autumn, we are enabling students to undertake their studies online for the Autumn term so that they can continue their studies. There is a low risk that we would need to close a current course for currently enrolled students if it materialised that the numbers of re-enrolling students were too low in number to provide a suitable educational experience. If the risk did occur the impact would be high. To mitigate this risk we have monitored the intention of our students to return, and have designed the teaching and learning delivery with small groups in mind. If we were considering suspending or closing a programme, due to extremely low numbers of returning students, we would consult current students (or their representatives) as part of the decision-making process. In considering whether to close a programme, the University will consider the arrangements from the point of view of the affected students, applicants and potential applicants, taking into account academic quality of provision, market demand, and strategic fit. If we decided that there was no other option but to close a programme, we would offer you teach-out of the programme if this was viable (see 3.1), or the opportunity to transfer to another programme (3.3). If there were no appropriate programme available, then we would provide certification for your credit, provide you with an exit award and support you in transferring to another provider (see 3.4).

Where the numbers of new applicants enrolling are very low in number and to continue with a programme would provide students with a poor educational



experience, there is a medium risk that we would need to temporarily suspend enrolment to some programmes which would mean that we could not offer those programmes to new applicants. To mitigate this risk, we track our applications carefully through the application cycle and if the risk were to materialise, we would inform applicants of any changes and would try to minimise any impact by offering suitable alternative arrangements. For example, we would help you to find an alternative programme or provider, or we would help you to defer your place for a year, or transfer to another programme at Regent's University London, if this was appropriate.

Withdrawal of specific specialist elective modules. Current risk: <a href="https://min.com/high-ncom/high-

### Study Period Abroad Outgoing. Current risk: high

Due to the impact of COVID-19 on international travel the risk that you will not be able to travel to your chosen study period abroad provider, or that such travel could be unsafe is currently <a href="https://example.com/high">high</a>. We have mitigated this risk by having robust and effective communications, quality assurance processes, and planning mechanisms with our international study abroad partners. We monitor these risks through our International Partnerships and Quality & Enhancement Team. If the risk did occur in advance of travel, we would mitigate this by helping you to find an alternative provider, or by enabling you to complete your studies by remaining with us at your 'home' institution, Regent's University London. If you were already abroad then the impact would be very high for students who were in that situation. Our major incident management team have a risk assessment and planning in place in event of study period abroad students needing to return home to the UK. See section 3.5 for how we would handle this situation and ensure continuity of your studies.

### Loss of Access to (credit-bearing) Placements. Current risk: medium to high

Some of our programmes involve self-sourced placements which contribute to learning and assessment and may be credit-bearing. Due to the impact of COVID-19 some placement providers are unable to continue to provide the same number of placements. The risk of students being unable to secure placements



is <u>medium to high</u> depending on the subject of study. To mitigate this, our Placement Officers work with our Quality & Enhancement Team and programme teams to identify any students or modules that may be affected by a reduction in the availability of placement providers. We also have strong partnerships with a range of placement providers, to help our students to secure placements where appropriate. Where it is not possible for a student to secure a placement, a suitable alternative assessment is always made available to ensure continuity of study.

Risks relating to partner institutions (excluding study abroad arrangements)
Current risk: low to medium

Before entering into any partnership arrangement where a qualification is awarded by Regent's but the teaching is provided by another institution, we carry out rigorous financial and academic due diligence. This reduces the risk of a partnership ending because the partner cannot deliver the agreed provision. We also carry out an annual review of the teaching provided by the partner and other periodic reviews as part of our quality assurance arrangements. Our agreements set out what our partner will do, and what we will do to protect students if the partnership comes to an end. Whatever the cause of the ending of the arrangement, we will work with the partner institution to agree an exit strategy that will be monitored by the University's Collaborative Provision Committee on behalf of the University's Academic Committee, taking into account the views of affected students.

### 2.2 Regulatory Risks

### Restrictions on or Loss of Degree Awarding Powers. Current risk: low

The risk of the University losing or having restrictions placed on its degree awarding powers is judged to be **low**. We mitigate this risk by having in place Governance and Quality Assurance processes that ensure the University's compliance with the regulatory framework and ongoing conditions of registration of the OfS. We also monitor our compliance through quality assurance and risk management procedures in accordance with our governance and academic regulations. If the risk did materialise and the OfS placed restrictions on or withdrew degree awarding powers, the impact would be very high for all students. In such circumstances we would provide you with an exit award and/or certification of credit for studies already successfully completed. We would also provide information, guidance and support for you to transfer to another provider. Details of transfer arrangements and of exit and certification can be found in 3.3 and 3.4 below.

### Loss of Tier 4 Sponsor Licence. Current risk: <u>low</u>

The risk of the withdrawal or suspension of our Tier 4 Sponsor Licence from the Home Office is <u>low</u> as long as we continue to be registered as a provider with the OfS, and comply with the Home Office's requirements for Tier 4 sponsors. To ensure that this risk remains low, we regularly review and monitor our



compliance through our 'Student Immigration and Compliance Services' Team in Registry and we work with experienced immigration lawyers who externally review our Tier 4 compliance to provide assurance to the University and our students. If the Home Office were to withdraw or suspend our Tier 4 licence, then the impact of this would be very high for non-EU (and from January 2021 non-UK) students who are studying with us on a Tier 4 visa sponsorship. Given the highly international make-up of our student population the wider impact of such a risk occurring would cause a loss of income that would trigger a financial risk to the University (see infrastructure risks). Measures that we would take if our Tier 4 licence were to be suspended would include providing an exit award and certification of credits for studies that you had already successfully completed, as well as information, guidance and support to transfer to another provider where that was an appropriate decision for you. Details of transfer arrangements for non-UK students and of exit and certification can be found in 3.3 and 3.4 below.

### Loss of Accreditation by Professional, Statutory and Regulatory Bodies. Current risk: very low

Programmes in the areas of Psychotherapy and Psychology have Professional Statutory Regulatory Body accreditation from Health & Care Professions Council, UK Council of Psychotherapy and the British Psychological Society. The risk that one or more of our programmes could lose accreditation by a PSRB is deemed <a href="mailto:very low">very low</a>. We mitigate this risk by ensuring that our programmes meet PSRB standards and requirements. We undertake audits of our compliance and the quality assurance of our programmes to monitor any risk, and we liaise with PSRBs on any changes to programmes or external standards. If this risk did occur the impact would be high, as it would affect the students who were studying on the courses for which the accreditation had been withdrawn. If a PSRB withdrew its accreditation, then we would either enable you to transfer internally to another programme that met your requirements, and/or we would provide information, guidance and support if you wanted to transfer to another provider and programme with the relevant accreditation. Details of transfer arrangements can be found in 3.3 below.

### 2.3 Infrastructure Risk

### Risk of Institutional Closure due to Financial Viability. Current risk: low

Regent's has a very cosmopolitan student population, with over 80% coming from outside the UK. There is a risk that some students may be unable to travel due to travel restrictions either in the UK or in their local area, and may not enrol or re-enrol, causing the University a loss in tuition fee income. However, this financial risk is currently judged to be <u>low</u> as it has been substantially mitigated by the recent transfer of the University to the Galileo Global Education group, which has invested sufficient resources and helped the University to establish a robust business plan that will ensure its financial sustainability in the short and longer term, and in the event that COVID-19 causes a loss of tuition fee income. In addition, to mitigate the risk of students not being able to travel to the UK in the next academic year, and of not being able to continue their studies, the



University is ensuring that all students are able to access teaching and learning online until the Spring term and while COVID-19 disruption persists. While we judge the risk of closure due to financial viability to be low due to the recent investment and new sustainable business plan, if such a risk were to materialise, the Office for Students could withdraw the University's status as a registered provider or restrict our ability to enrol new students. The impact of such an event would be significant for all our students and would compromise our ability to sponsor non-UK students for Tier 4 licences. If such circumstances arose we would work closely with the OfS to put in place arrangements that allowed our students to complete their studies where the teach-out of part or of a full year of study was viable, or transfer to another provider with an exit award and/or certification of credit for studies already successfully completed. Details of teachout, transfer arrangements and of exit and certification can be found in 3.1, 3.3 and 3.4 below.

### Building or campus closure due to external events. Current risk: very high

The risk that external events result in building or campus closure is currently very high due to the impact of COVID-19 which caused us to close our campus and rapidly move to online delivery of all teaching and learning and student support from March 2020. We have continued to provide a full range of student and wellbeing support and academic advice remotely. We have continued to conduct examinations and assessments remotely, with reasonable adjustments to our regulations that took into account the impact of this rapid online pivot on our students' experience and continuity of study. We mitigate risks posed by external events outside of our control by having a Major Incident Management (MIM) Plan and Group as well as business continuity plans in place. . If external events such as a potential second wave of COVID-19 caused closure to buildings or the campus, the impact would be very high as it would affect all students taught on campus. To mitigate the risk of disruption caused to the continuation of teaching the University has convened a Return to Campus Working Group and Online Delivery Teaching and Learning Group to establish planning that ensures the continuity of teaching and learning. The University will deliver all teaching and learning online for the Autumn term to ensure no disruption to students in the event of a second wave. The University's COVID-19 risk assessment and Major Incident Management Planning will be in place to ensure risk mitigation where campus is open for social learning activities and access to facilities.

The University has business continuity plans that address other risks, such as failure of IT systems, fire or other incidents.

### **Section 3: Mitigation of Risks**

We have outlined a wide range of risks that could occur and if they did materialise could cause disruption to the continuation of your study. We have explained above some of the actions that we have taken to mitigate these risks and other actions that we would take to support you if these risks occurred. We provide more detail below on what we will do to



support you in continuing your studies if these risks occur, or if we are unable to support you in continuing your studies.

#### 3.1 Teach-out

Teach-out means that we will continue to deliver teaching on your current programme, if one of the risks outlined above should occur. If we need to teachout your programme we will ensure that the quality of your programme, the teaching provided, and your student experience are maintained to same level as you could expect if your programme were continuing for future students. We will provide you with information, advice and guidance on your options, including transfer to another programme or externally to another provider. We are aware some students will have specific needs such as caring responsibilities. Where it is necessary to change any aspect of your programme, including the elective modules available during the teach-out of your course, we will consult you on these changes and explain the reasons why they are necessary. We will communicate with you through your student representatives, and the Hub team, and provide opportunities for you to have individual meetings with your personal tutor or Head of Programme. This is to ensure that you have enough information to understand how the teach-out process will work for you and that you have the opportunity to raise any questions or concerns. All quality assurance processes such as annual monitoring of programmes will continue for any programmes in teach-out until all students have completed, to provide assurance on the maintenance of quality and standards are maintained.

#### 3.2 Internal transfer to another programme

If you are unable to continue your current studies due to programme closure the University will support you to move to a programme that is similar to your current programme of studies. To help you make a decision that is right for you, your Head of Programme and/or a member of the Hub team, such as a Student Achievement Officer will discuss your options with you. We will explore with you any specific needs, such as caring responsibilities for example, and provide you with information about finances or Visa status. When discussing the option of internal transfer with you, we will explain similarities and differences between the programmes on offer and identify programmes that provide the nearest match with your original programme of study where possible, including learning outcomes, assessments, tuition fees and any additional equipment or costs that you might incur, and graduate career prospects. Once you make your decision to transfer to a programme internally, we will make the necessary adjustments to your registration and provide you with all the details of the programme delivery and access to resources. If you decide that you do not wish to transfer to another programme at Regent's then we will support you with information, advice and guidance on transferring to another programme at a different provider. Alternatively, you could leave your studies early with an exit award (if you have obtained sufficient number of credits) and certification of your academic achievement. We will also provide guidance on your entitlement to refunds and compensation if the situation of programme closure were to arise during your enrolment.

### 3.3 External transfer to another provider (UK and non-UK students)



If you are unable to continue your current studies due to programme closure the University will support you to move to a programme at another provider. To help you make a decision that is right for you, your Head of Programme and/or a member of the Hub team, such as a Student Achievement Officer will discuss your options with you. We will explore with you any specific needs such as caring responsibilities. We will compare the other provider you have chosen for an external transfer to set out the differences in academic and student support such as, accommodation, Visa status, learning resources, financial support including scholarship or bursary, wellbeing support, accessibility, career advice, guidance on student complaints. If you decide that you want to transfer, and the provider of your choice is able to offer you a place on the programme, then we will support your transfer working with the relevant University, including supporting you with any Recognition of Prior Learning processes. Given the highly international make-up of our student population, we recognise that some students would want to transfer abroad.

#### 3.4 Exit awards and certification

The University's academic regulations enable students who transfer externally to have the appropriate exit awards and certification with evidence of their academic achievement. If sufficient credit has been earned, then an appropriate exit award will be confirmed by the progression/finalist board and you will be issued with a transcript. If you have insufficient credit for an exit award, then you may apply to the Student Hub for a transcript of your results (which for other providers of higher education confirms earned credit for transfer purposes). Although the risk of institutional closure due to financial viability is currently low, if this risk were to materialise, the impact on students would be very high, and we would undertake all measures possible in line with our academic regulations to ensure that year-long modules could be appropriately modified to provide certification for credits achieved. Where not continuing with a programme of study in the UK might impact your Visa status, we would also ensure that we talk to you about this and provide you with information, advice and guidance to help you make the right decision for you.

### 3.5 Students on study period abroad

Many of our programmes offer a term of study abroad at one of our partner Universities. Studying abroad has been affected by COVID-19, but the University is still committed to working with you individually to offer the best possible study abroad experience as a valued part of your degree.

Where your term abroad in the autumn 2020 has been affected by COVID-19 implications, we have already been in touch to discuss and confirm changes as appropriate to your particular situation. If the country of choice is not an option in future terms, we would identify an alternative location that could provide the same or similar educational outcomes. We have also provided enhanced information on key areas to your term abroad in the autumn, in our Study Abroad Pre-Departure & Arrival Guide. As part of our improved measures to secure your safety and wellbeing whilst abroad, we are asking all students going abroad in autumn 2020 to complete an online risk assessment before their departure. If you were in the position of being insufficiently supported or unsafe during your year abroad, then we would broker a new arrangement with a nearby or



contextually similar institution that could provide an alternative for you. Alternatively, we would give you the option to return to continue your studies for your term abroad, in the UK. If teaching could not be completed mid-way through your term, and there were no alternative options, we would support you to return the UK and continue your study, undertaking an alternative assessment to achieve any missing academic credit.

### **Section 4: Refunds and Compensation**

This section of the student protection plan sets out our policies and procedures for refunds and compensation. Regent's refund policy applies to all our students. The population includes, but is not limited to, students in receipt of tuition fee loan schemes (SLC, US Department of Education and other), students who finance their own studies and students whose fees are paid for by a sponsor (corporate, family or other). If your refund request is approved, the University repay funds within 14 days of our Finance office receiving your request. We will pay the refund to whomever made the original tuition fee payment. Should any successful claim be made, the University has financial reserves in place to meet its obligations, which will be sufficient to provide refunds and compensation for any students at an increased risk of non-continuation of study.

#### 4.1 Refunds

Regent's University's full Refunds Policy can be found on our website here: Refunds Policy.

### This includes:

- refunds for students in receipt of tuitions fee loan from the Student Loans Company.
- refunds for students who pay their own tuition fees.
- refunds for students whose tuition fees are paid by a sponsor, where refunds are only paid to the original payer.
- · commitments to honour student bursaries.
- compensation for maintenance costs and lost time where it is not possible to preserve continuation of study – on a case-by-case basis;
- compensation for tuition and maintenance costs where students have to transfer courses or provider on a case-by-case basis.

Students will be eligible for refund of the term's fees as shown in the table below. For new students, the non-refundable deposit will be deducted before the calculation of the refund value.

Weeks are defined with reference to the start date of the relevant term. For new students, week 1 will be classed as either the induction week or week 1 of study.

For a returning student week 1 will be the start of teaching. After the end of Week 3 (Friday), no refund of tuition fees will be made.

Week of formal withdrawal	Percentage of term's fees refunded	
1 (Monday to Sunday)	80%	



2 (Monday to Sunday)	60%
3 (Monday to Sunday)	40%
4 (Monday onwards)	0%

### 4.2 Compensation

The University is committed to delivering programmes once a student has enrolled. If a decision is made to close a programme, the University will normally commit to a teach-out period to enable students to complete their studies assuming their progression is as planned. In the unlikely event that a teach-out period was not possible and you were unable to continue your studies with us, and you transferred to an alternative institution, the University would honour any commitments to bursary payments assuming you progressed as planned at the new institution. Compensation for any additional costs would be considered on a case by case basis by the University. This may include but would not be limited to maintenance costs. In the case of programme closure if transfer or teach-out were not an option, we would discuss the question of compensation with you.

## Section 5: Communicating with you about the Student Protection Plan

The University draws the attention of current and future students to its Student Protection Plan by publishing it on its website here: <u>Student Protection Plan</u>
Any changes to the Student Protection Plan are also notified to students.

We will ensure that staff are aware of the implications of our Student Protection Plan when they propose course changes, by providing training to relevant staff.

Our Student Protection Plan will be reviewed on an annual basis by the Academic Committee, following consultation with the Student Union, and approved by the Board.

The University is committed to communicating changes to you as early as possible, with clear information and options. We will include student consultation and representation in our decision making.

Once a material change has been approved, you will be informed at the earliest opportunity by University staff, directly through email communications, FAQ pages where appropriate, and you will be invited to attend one-to-one and group meetings with your Head of Programme and a Hub advisor to discuss your views so that we can take them into account.

Where we are making significant changes to your programme, we will provide initial communication as described above. The communication will include an explanation of the proposed changes, details of the implementation date, how the changes will affect you, how to access further information, advice and guidance (IAG), and how to tell us your preferred



option. We will develop further IAG in liaison with the Students' Union and your student representatives, working closely with your Heads of Programme, to ensure that the IAG meets your needs and covers what you need to know. Staff from the Registry teams, Finance, and the Hub team, will also be involved in developing and delivering the IAG. The IAG will include specialist advice that covers wellbeing, mental health and counselling, disability support, visas and immigration, finance, accommodation.

The IAG provided to you will be tailored to your needs and circumstances which we will consider through consulting with you, and through understanding your specific needs, and the needs of your cohort. This will include tailored advice for UK and non-UK students, which will clearly explain your options. You will be able to access the IAG via the website, FAQs and through the virtual learning environment.

We will also ensure that you are aware of any external information, guidance and advice such as guidance for students from our regulator, OfS, the Student Loans Company and the OIA. In the case of a significant material change such as the risk of closure of the University due to market exit, the University would involve the regulators in the development of the IAG as well as all mitigation action planning.

### Section 6: How to make a Complaint About Our Handling of Student Protection

Regent's aims to resolve quickly and fairly any complaint that a student may have about different aspects of his/her relationship with Regent's University London.

Regent's is committed to managing complaints in a way that:

- is timely and efficient, to facilitate a speedy resolution
- is fair and transparent to all parties
- promotes informal conciliation where appropriate
- promotes feedback and best practice to inform academic and professional services departments, and enhances the student experience

The Student Complaints Policy applies to any student who is or was enrolled or provisionally enrolled on a programme of study offered by Regent's University London. This includes programmes which are externally validated, as well as all programmes leading to a Regent's University London award.

The process for making a complaint can be found in our Student Complaint Policy: <u>Student Complaint Policy</u>

If a student feels their complaint is still not resolved or that the outcome is unreasonable in relation to the evidence, they may raise their complaint with the Office of the Independent Adjudicator (OIA).

The OIA is an independent body that operates externally to the University. Further information is available from the OIA website <a href="http://www.oiahe.org.uk">http://www.oiahe.org.uk</a>

