

Student Protection Plan to Protect Continuation of Study

Introduction

- 1.1 As a registered provider of higher education the University of Gloucestershire is required to have in force and publish a student protection plan, which has been approved by the Office for Students (OfS), in order to inform our students of risks that may affect the continuation of their studies. This Plan is therefore written with students in mind and is intended to provide assurance to our current and future students, as well as to the OfS, that we have in place appropriate arrangements to protect the continuation of study for our students.
- 1.2 The University is also aware that our students come from diverse backgrounds and, in the event of the realisation of any of the risks covered in this plan, will have different support needs. This includes but is not limited to students sharing particular protected characteristics (as defined in the Equality Act 2010). In implementing any measures to protect continuation of study we will consider the impact of changes for students with different needs, characteristics and circumstances.

University Approach to Risk Assessment

- 1.3 The University is confident that its management of risk, through a multi-layered approach, is robust. At institution-level, the University operates a risk cycle through which a risk register and accompanying action plan is revised annually and approved through the University Executive Committee, Audit Committee, and Council. It is kept under review throughout the year. Risks are assessed in terms of likelihood and each is defined as one of the following:

Highly Unlikely	20% probability of the risk occurring in the next 2 years
Less likely	20% - 50% probability of the risk occurring in the next 2 years
Likely	50% - 80% probability of the risk occurring in the next 2 years
Highly Likely	Greater than 80% probability of occurrence in the next 2 years
- 1.4 In addition to the institution-level risk assessment activities, the University's annual Business Planning cycle provides a forum for the University Executive Committee to agree the annual programme of activity with each School and professional service department and integral to this cycle is the identification of 'local' risks.
- 1.5 Furthermore, the University recognises that unexpected major incidents have the potential to cause significant disruption to the day-to-day operation of the University. It has therefore developed a comprehensive Business Continuity Policy with an accompanying suite of planning documents to ensure it can not only deal with the immediate consequences of a major incident but also consider the long term impacts on the University and, where practical, improve resilience. The University's major incident management and business continuity planning is guided by the following core aims:
 - to protect people from harm;
 - to protect critical infrastructure and facilities;

- to resume teaching, research and key services in an appropriate timeframe, with the minimum of disruption.

Structure of the Student Protection Plan

- 1.6 The plan is structured across four sections as follows:

Section 1: Risk Assessment – this section outlines the range of identified scenarios that may risk the continuation of study of students whilst also detailing the likelihood of the risk occurring.

Section 2: Risk mitigation – this section identifies the measures that the University has put in place in order to mitigate those risks that have been specifically identified as ‘likely’ or ‘highly likely’.

Section 3: Tuition Fee and Bursary Policy – this section outlines the University’s Tuition Fee and Bursary policy and details how the University can deliver the financial implications of this policy.

Section 4: Communication - this section outlines how we will communicate about the plan with current and future students and how the plan will be reviewed with the involvement of current students. It also details how we will communicate with affected students should any element of the plan be implemented.

- 1.7 It should be noted that this Plan explicitly deals with risks to the continuation of study. It does not address risks to the quality of the content or delivery of courses and addresses these risks through its Quality Framework and other established policies and procedures.

General Enquiries and Complaints

- 1.8 For any general enquiries regarding the Student Protection Plan, please contact Andrea Chalk, Director of Quality and Academic Services (achalk@glos.ac.uk).
- 1.9 If enquires have arisen in connection with the implementation of any measures within the Student Protection Plan, students should first use the local contact provided to them as part of the process affecting their programme. Should students have queries remaining after attempting to resolve their enquiry at a local level they may approach the Director of Quality and Academic Services.
- 1.10 The University’s Complaints procedure for students can be found through [My Glos](#) and this procedure should be used if a student has a complaint about the implementation or lack of implementation of this plan.

Condition C3

Student Protection Plan for Academic Year 2018/19

Provider's name:	UNIVERSITY OF GLOUCESTERSHIRE
Provider's UKPRN:	10007145
Legal address:	University of Gloucestershire, The Park, Cheltenham, GL50 2RH
Contact point:	For enquiries about this student protection plan please contact the Director of Quality and Academic Services (achalk@glos.ac.uk)

Section 1: *Assessment of the range and level of risks to the continuation of study for students.*

- 1.1 The risk of institutional financial failure resulting in the institution as a whole being unable to operate is considered to be **'highly unlikely'** for the following reasons:
- a) The University's finance strategy is designed to ensure the long-term success of the University, and its financial performance is monitored regularly on a monthly basis, with quarterly reporting to the University's Finance and General Purposes Committee and University Council. The ongoing monitoring enables, if required, the proactive application of corrective action;
 - b) The financial KPIs the University operates within have been set primarily to ensure long-term financial sustainability, and the University has robust treasury management procedures in place;
 - c) Annually, a three year financial forecast was produced and submitted to HEFCE in which the last submission showed the University expecting to achieve its KPIs in the forecast period;
 - d) Based on the most recent statutory accounts (2016-17), on the basis of financial sustainability, good management and governance matters, in February 2018, HEFCE classified the University's risk status as 'not at high risk';
 - e) The University's business continuity plan identifies the critical financial activities the University undertakes, which includes financial planning, treasury etc.
- 1.2 The risk of the University losing its degree awarding powers, university status, or registration with the Office for Students (OfS) is considered **highly unlikely** due to a comprehensive, embedded academic and corporate governance framework that ensures that checks, controls and systems are in place to prevent events that would lead to this occurrence. The University has a robust framework in place that ensures all conditions of registration with the OfS are attached to a member of the University Executive. This

framework is overseen by the University Executive Committee and reported for assurance to the Audit Committee.

- 1.3 There is a higher risk of interruption or damage to the University's IT structure reflecting not only the possibility of internal service failure but also the increasing threat of a significant, successful cyberattack upon the University due to the current global threat to cybersecurity (see section 2 for mitigation measures and consideration based on students' needs and circumstances).
- 1.4 The risk of the possible unavailability of University accommodation to provide teaching due to the late delivery of transformational capital projects (eg the development of the new Business School at Oxstalls campus) is considered to be **less likely** due to existing established controls (eg early and ongoing tracking of various work stages against the master programme).
- 1.5 The risk of failure of an academic partnership resulting in termination of the partnership is considered to be **less likely**, although due to the unpredictable political and financial environment within which partners operate we have included details of our mitigating actions in respect of this aspect of our provision. Mitigation against the failure of Academic Partnerships includes:
- a) Comprehensive due diligence checks (assessing audited accounts, contractual relationships, potential conflicts of interest etc) are undertaken prior to the approval of a new collaborative partnership. Additionally checks are conducted at the location of delivery in order to thoroughly assess the teaching environment within which the University's courses will be delivered;
 - b) All collaborative partnership arrangements are governed by a legally-binding collaborative agreement which details the basis of the relationship and ensures that appropriate provision is made to allow students studying on courses to complete their courses in the event of termination of the partnership;
 - c) Twice yearly periodic review of the financial and quality assurance health of academic partnerships is undertaken by the University Executive Committee through the Annual Business Review process;
 - d) A network of Academic Link Tutors and dedicated Academic Partnership Managers provide ongoing academic and relationship management support to the partner;

The University's response to the failure of an academic partnership would depend on the given situation with the priority focus being to facilitate teaching-out, where required, and to ensure the maintenance of the student experience. This response has been tested on several occasions in the past as the University has previous experience of terminating partnerships. The University would trigger such a termination in circumstances where the interests of students were at risk as a result of the continuation of the partnership, or the partnership was for some other reason unsustainable. However, the continuity of study for students is always treated as paramount in such situations which is underlined by the provisions made explicit through our partnership contracts.

- 1.6 The risk of failure of the joint venture INTO pathway centre, which provides pre-undergraduate programmes for international students, is increased by the ongoing volatility of international student recruitment. The University keeps the performance of the pathway centre under regular review. (see section 2 for mitigation measures).
- 1.7 The risk of failing to maintain the university's UKVI licence, which would only directly affect international students, is considered to be **highly unlikely** due to the dedicated internal resource within the Immigration Compliance team which has focussed on

ensuring that the University is compliant with UK Home Office immigration rules and requirements. In addition RSM undertook an internal audit in February 2017 of the University's UKVI compliance arrangements and the outcome was as follows: *"Taking account of the issues identified, the Board can take substantial assurance that the controls upon which the organisation relies to manage the identified risks are suitably designed, consistently applied and operating effectively."*

- 1.8 The risk of closure of all or part of one or more of the University's campus is **highly unlikely**. The current transformational capital projects do not include any campus closure plans, and each of the current campuses has been occupied for some time indicating significant stability. Unexpected events requiring a temporary campus closure are also highly unlikely and would be managed by our major incident and business continuity procedures, which would focus on minimising student impact and bringing campuses back into service as soon as possible.
- 1.9 The risk of non-completion of teaching delivery due to the closure of an academic School or Subject Community (both of which would affect disciplines rather than individual courses) is **highly unlikely**. Although the University may review its structure which may result in the closure of a School or subject community, any such restructuring activity is carefully planned and monitored through University Executive Committee, Academic Affairs Committee and Academic Board in order to ensure the continuity of study for all affected students.
- 1.10 The risk of non-completion of teaching delivery of a course is considered to be **highly unlikely**. Due to the current state of the higher education market and challenges in recruitment, it is highly likely for courses to be deemed non-viable from a student experience, academic or resourcing perspective - a course may be identified for closure due to a number of reasons including portfolio review, insufficient enrolments, loss of relevant professional accreditation or the temporary or permanent loss of key staff (including supervisory capacity for research students). Given the University's interest in delivering courses that have current value and meet student needs, the academic portfolio is constantly being refreshed and the University therefore has considerable experience of terminating unviable courses successfully, ensuring that student interests are at the forefront of any planning. The University closely manages the likelihood of the closure of a course, as well as the closure process itself, to ensure continuity of study for students and their experience in these circumstances through the following measures:
- a) An annual process of portfolio scrutiny, through the Academic Portfolio Review, the results of which are reported through the academic governance via Academic Affairs Committee. The process tests the viability of each course from the academic, financial, quality and general health perspectives and is therefore able to identify risks to particular courses and formulate action plans accordingly.
 - b) A 'discontinuation and phasing-out of courses' procedure is followed when a course is identified for closure in order to capture and monitor teaching-out arrangements during the phasing out period to ensure not only the continued quality of teaching and learning but also the maintenance of the student experience until all students have completed their studies;
 - c) Local risk assessment, through the Business Planning process, identifies risks that may affect the viability of specific courses and action plans are developed accordingly (see also paragraph 2.3).

Section 2: *The measures that we have put in place to mitigate those risks identified above as higher risks:*

2.1 Mitigation against the risk of interruption or damage to the University's IT structure includes:

- a) The identification of specific staff within IT Services to undertake ongoing risk assessment;
- b) Review, internally and externally, of the Information Risk Policy framework in order to ensure that it reflects the current level of external threat;
- c) The introduction of a regular schedule of penetration tests of targeted areas of the network and systems;
- d) Firewall protection of the network, internal segregation using virtual separation and monitoring at the network level of external network threats;
- e) Anti-virus software which provides alerts and removal of virus threats;
- f) Enhanced protections of specific business systems.

The University's response to interruption or damage to the IT structure would depend on the given situation – an assessment of the problem would be made and an appropriate action plan devised. The assessment would include consideration of students that are highly dependent on IT either through their course of study (eg Computing courses) or for other reasons (eg distance learners students or students with disabilities) in order to ensure the quality of teaching and learning and maintenance of the student experience.

2.2 Mitigation against the higher risk relating to the joint venture INTO pathway centre includes:

- a) Regular communication and updates from INTO received by the Deputy Vice Chancellor;
- b) Ongoing product and marketing development involving staff from INTO and the University;
- c) Ongoing close monitoring of recruitment and finances by the INTO joint venture Board;

The University's response in event of some or all joint venture programmes needing to be terminated would focus on ensuring continuity of study in order to enable students to complete the programme that they started.

2.3 The University intends in any likely scenario to ensure that students are taught out on any programme they started. We believe that the structures we have in place, including our academic governance and robust financial strategy, make it significantly unlikely that we would not be in a position to achieve that. However, each closure is considered on a case-by-case basis and as an institution that places students at the heart of our activities we would consider any measure to support students in continuing their studies in the unlikely event that a teach-out was not possible, including facilitating arrangements for the transfer onto alternative University programmes or the transfer to a programme at another institution (where possible), refunds, compensation, or payments to cover additional and legitimate costs incurred by a student.

Section 3: Tuition Fee and Bursary Policy

3.1 The University has a [Tuition Fee and Bursary Policy](#) that outlines the circumstances in which we will refund tuition fees and other relevant costs to students. The policy also outlines the payment of bursaries and scholarships to students.

3.2 As at 2016/17 year end the University had cash reserves of £13m net cash inflow from operating activities which would be sufficient to provide refunds and compensation for any students who may be at an increased risk of the University being unable to continue their studies. The University's Finance Strategy target in relation to cash generation from

operating activities is set at 10% of income, KPIs are closely monitored and corrective action implemented if required to ensure they are achieved. In addition the University has a robust Treasury Management function managing both risk and performance effectively, at the end of 2016/17 119 liquidity days were achieved against a target of 75 days.

Section 4: *Information about how the University will review the student protection plan and communicate with students about the plan:*

- 4.1 The Student Protection Plan will be published through the 'your course' area of 'My Glos' which is accessible by all current students. Additionally it will be added to the suite of policies and regulations that form part of the Student Contract to ensure that it is accessible to future students;
- 4.2 The Student Protection Plan will also be accessible to staff through [Infonet](#) in 'Staff Resources'.
- 4.3 The Student Protection Plan will be reviewed annually in order to ensure that it remains relevant (ie remains in line with the University's risk assessment cycle), effective and practical. The review will be undertaken by the Academic Board, the membership of which includes representatives from the University of Gloucestershire Students' Union.
- 4.4 In the event of measures within the Student Protection Plan being implemented the University will communicate with affected students through the most appropriate channels according to the particular situation. These channels will include but will not be limited to individual and group meetings with affected students, e-mail, formal letter, announcements on MyGlos, and via the student representation system.
- 4.5 If the University experiences a major incident, communication with students will be in accordance with the Business Continuity Policy. The University will ensure that affected students are signposted to independent advice as appropriate to the situation.