



Student Protection Plan

2020/2021

Introduction

What is a Student Protection Plan?

Every university must have a Student Protection Plan. The Office for Students approved our first Plan in August 2018. We updated our Plan in August 2019 and in August 2020. This Plan covered the academic year 2020/21. The University decided to extend the Plan to 31 December 2021.

Our Plan explains how we manage risks relating to the education we deliver. We explain the actions we would take if there was a risk to you continuing your studies. We describe how we would communicate with you and support you if these events should happen.

Who does the Plan cover?

This Plan covers all applicants to, and current students at, the University at all levels of study.

Our partner institutions may have their own Student Protection Plan. They must have a Plan to register with the Office for Students. If they have a Plan, they will provide a copy on their website.

How does the University Manage Risks?

We consider risks to the continuation of the delivery of education regularly. We keep a strategic risk register to record the risks we identify. At least four times a year we review the content of the risk register. This allows us to update the level of each risk and new ways of overcoming the risk. The University's Audit Committee, which is part of our Governing Body, actively monitors risk. It receives and scrutinises reports of our highest risks four times a year.

The risks we identified below could result in a failure to provide an appropriate student experience. These are the risks that we consider regularly. As such, we have in place mitigations to help to reduce the impact on students if any of these things came about (or 'crystallise').

We carefully considered the impact of Covid-19 on student protection. We revised our Plan to take account of its effects.

Section 1

An assessment of the range of risks to the continuation of study for our students

What is the risk that the University is no longer financially sustainable?

As part of preparing the Student Protection Plan for 2020/2021, we undertook a risk assessment. This formed part of the risk management process. The reason was to identify risks likely to crystallise.

It is our assessment that our current financial position means the risk we will become unable to operate is **low**. We looked at our financial position as a result of Covid-19 and the way it might affect the University in the future. We decided the medium and long term financial strength of the University was good. We decided we needed to make savings in the academic year 2020/21. We agreed with our staff the way in which we would make the savings. As a result, we are able to call upon contingency and other funds to meet the commitments set out in this Plan.

We have business continuity plans in place to deal with challenges relating to recruitment. These include strategies for extending the recruitment cycle into Clearing.

We identified no risks likely to crystallise that would mean we were no longer financially sustainable.

We publish our Financial Statements for the previous financial year on our website every December.

What are the risks relating to Covid-19?

It is our assessment that the risks to the continuation of study for our students relating to Covid-19 remain **low** because we are able to put in place contingency measures to enable students to complete their studies. We set out our approach to responding to Covid-19 on a dedicated [website](#).

Some courses include a placement with an employer. The University depends on employers being able to offer the placement. As a result of Covid-19, the risks relating to Covid-19 to our students undertaking a placement remain **low to medium**. However, alternative qualifications are available that means the risk of students who have placements not receiving a qualification is **low**.

The public health position remains one of uncertainty. We identified ways we could respond to further developments relating to Covid-19. This included making changes to our courses. We engaged in contingency planning to take account of action needed because of Government and public health requirements. This contingency planning included consideration of what needs to be done to protect students both in terms of their health and their studies in the event of any adverse changes.

What is the risk relating to the Kent and Medway Medical School?

Canterbury Christ Church University and the University of Kent run a joint Kent and Medway Medical School (KMMS). KMMS is a new medical school. The Bachelor of Medicine, Bachelor of Surgery course is subject to successful progress through the General Medical Council's quality assurance programme. Please visit the KMMS website for the most up-to-date information: www.kmms.ac.uk.

Both universities would work together to manage continuity of services and provision for students in the event of their being disrupted. KMMS is working in partnership with the Brighton and Sussex Medical School (BSMS) for support and quality assurance purposes.

If the decision is made to discontinue the KMMS there is provision to sustain the student experience. BSMS agreed to the transfer of all KMMS students onto the Bachelor of Medicine, Bachelor of Surgery degree offered by BSMS. As such students would become students at the University of Brighton and the University of Sussex. These would become the awarding institutions upon satisfactory completion of the BMBS degree by the student.

It is our assessment that the risk we are unable to operate KMMS is **low**.

What is the risk relating to partner institutions?

The risk we will no longer be able to offer courses to students registered at our partner institutions is **low to medium**.

We select good-quality partners following rigorous financial and academic due diligence. Our due diligence of new partners reduces the risk of a partnership ending because the partner cannot deliver the agreed provision. We are including student protection as part of the agreements we have with our partners. This includes agreeing an approach to student protection if we decide with our partner to end a partnership.

We undertake a periodic review of the financial health of our partners. We undertake an annual review of the educational provision made by the partner. We do this through our quality assurance arrangements. In addition, we review how Covid-19 affects the provision with our partners.

Some smaller partners may be less financially stable. They may be unable to react to volatility in the market. We have the financial capacity to maintain the provision of education for students at smaller partners unable to continue to operate. For larger partners, the University has the capacity to negotiate with other providers to agree a means of ensuring students complete their course.

We have a small number of partners outside the UK. We have agreements in place to ensure we have in place the means for student to complete their studies. This might include making an agreement with another provider in the country. This would only be if the partner outside the UK was unable to continue.

What happens when agreements with partner institutions end?

From time to time, partnership arrangements end. Mostly this is by mutual agreement between the University and the partner or because of a transfer of the partnership to another awarding body. Should the University consider a collaborative arrangement no longer viable, for financial or educational reasons, we end the agreement. We have a means for ending such partnerships, which we have made use of in the past. We will continue to do so in the future. We focus on student protection matters when ending the agreement.

In July 2020, we decided to end the agreement with a number of partner colleges we work with in the Faculty of Education. This means we are not taking on students from September 2021 at these partners. This followed a review of our provision. We are doing so with the full co-operation with our partners. We wrote to all students affected by the change to explain what it means for their studies. The risks to these students at these partner colleges not completing their studies are **very low**.

In managing risks to students completing their studies, we look at the circumstances. We consider the numbers of students on the course and the point reached in their studies. We look at why the partner is unable to continue to provide the course. We will identify the options available. We will do this through discussions with the partner and consultation with our students and Students' Union. We will discuss the options with the students affected.

In most cases, we will arrange for a teach-out of the course. Every collaboration agreement we enter contains teach-out provisions to protect students following the end of the partnership. These provisions state the University and the partner will teach-out the students affected. If our partner institutions are no longer able to offer courses to students registered with them, the University will usually arrange for the teach-out.

In the unlikely event that a teach-out were not possible the University would offer refunds and compensation to affected students in line with the [Student Refund and Compensation Policy](#). If we can identify better options, we will discuss those with the students. We include this as part of the agreement with the partner ending the partnership.

The risks to students at partner colleges not completing their studies remain **low**.

What is the risk that we will close the Faculty or School in which your course is being offered?

The performance of all our Faculties and Schools is monitored through an annual review process against an agreed set of key performance indicators. This covers education, research and financial performance measures. Additional support is put in place for those Schools for which a specific support need is identified.

We regularly review our academic organisational structure. This can include the reorganisation of faculties and schools. Before we make any changes, we consult with those affected by the changes. This includes consulting with students through the Students' Union.

In 2020/21, we are making some changes to Schools and Faculties. We established a Faculty of Science, Engineering and Social Sciences in 2020. We are reorganising the Schools in the new Faculty. From 1 August 2020, we are amalgamating the Faculty of Education and the Faculty of Arts and Humanities. There may be changes to the allocation of courses to Schools following new Faculty structures. Any changes would follow the [University's Change Policy](#). The risk of disruption to a student's study following the Faculty changes is **very low**.

What is the risk that a module will not run?

The risk to an individual module not running is **low** for a compulsory module and **medium** for an option module. If we are unable to run a module due to viability of student numbers or availability of staff, we take a decision at the earliest possible opportunity. We would let the students affected know in advance of the decision and offer a suitable alternative module. Any changes would follow the [University's Change Policy](#). The risks to students being unable to complete their studies because of a module not running are **low**.

What is the risk that we will close a campus permanently?

The risk we will permanently close one of our three campus (Canterbury, Medway and Salomons Institute, Tunbridge Wells) at which your course is taught is **very low**. We review and scrutinise our finances regularly to ensure our activities across all campuses remain viable. The University's [Master Plan](#) provides investment to support a long-term maintenance programme of work and to build new on-campus facilities that are modern and fit for purpose.

What is the risk that we will close a campus temporarily?

In the event that a safety or security incident occurs, the University's Emergency Planning and Business Continuity Framework is brought into effect. In addition, we have contingency plans in place relating to Covid-19.

In the event of emergencies that impact on students, communications would be managed through business continuity plans to provide information on the available access to our facilities.

We have comprehensive insurance cover in respect of all risks, including property and business continuity, to ensure it has sufficient resources to sustain the provision of education in the event of a serious incident at any of its campuses.

The risks to students being unable to complete their studies are **low**.

What is the risk of changes to, or discontinuation of, your course due to an academic review?

The risk we will be unable to offer courses attracting sufficient numbers of students to make them viable is **low to medium**. The University developed quality assurance arrangements to [monitor education provision](#). The purpose is to ensure the continued quality of the courses. This allows us to identify where it is necessary to make changes.

The most likely cause of discontinuation is through a course closure. This is likely to occur when a course reaches the end of its marketability due to a trend of falling recruitment or changes within the field of study. These are strategic decisions. This means there is an opportunity to give applicants and students notice of the change. Usually, there is a replacement by a new course within the same subject area as the closed course. We have a commitment to the teach-out of the curriculum to the students registered on the closed course.

Our plan for dealing with the closure of a course includes arrangements for communicating with applicants who accepted a place. Applicants who accepted a place on a course which is then closed, but have not commenced study, will be offered advice and support. This is to help them decide whether to transfer to a different course with us or to seek a suitable alternative at another provider.

We also work closely with students who are on a course closed to new applicants. This is to ensure they are supported in their studies so they can complete their qualification. In some cases, this support might include a transfer to another course. The risks to students being unable to complete their studies on courses closed to new applicants are **low**.

What is the risk of a need for students to transfer to different courses?

Exceptionally, it might be beneficial for students to transfer to a similar or replacement course. This is particularly important for courses leading to professional registration. It is an important consideration in our response to Covid-19.

A change to professional standards may require changes to the relevant training. The risk to the student is **low**. This is because we offer a range of courses, and there is a high likelihood that a similar course is available to the student. Where there is a need to transfer to a replacement course, this would be on offer before closing the previous course.

If there were a need to transfer students to a similar or replacement course, the University would consult with the students affected. This is in line with the [University's Change Policy](#). The University would, if the need arose, apply the [Student Refund and Compensation Policy](#).

The risks we are no longer able to deliver material components of our courses is **low**. We have protections in place for the students affected. The University makes any material change in accordance with the [University's Change Policy](#). A key requirement of the Change Policy is a requirement to consult the students affected by the change.

What is the risk that we will make changes to your course?

We regularly review our academic provision through our [Annual Course Monitoring](#) process. This is to maintain academic standards and to ensure our courses keep up-to-date. These reviews may result in changes to course provision. We have [Course Modification](#) procedures and agreed timescales to inform you of such changes. Where appropriate, we will consult with you.

These reviews may result in changes to how courses are organised and delivered. This could include a course moving into another School within the University. This to ensure that the interests of students can be protected.

What is the risk that we will discontinue your course before you finish?

The risk we decide to discontinue your course before you are due to complete is **very low** as we would plan such a change to allow current students to complete their studies. We also take steps to minimise the impact on their studies. Where students are likely to be affected by such a change, the University has procedures in place to inform and consult with the students concerned. In some circumstances, we also engage in consultations with the Students' Union.

When a student interrupts their study, there may be a risk there has been a discontinuation of the course. We will set out the options for the individual concerned. We will support the individual concerned and provide appropriate advice.

In the **highly unlikely** event that you were unable to complete your studies with us, we would agree a programme of advice and support to enable you to transfer to an alternative provider.

What is the risk of having insufficient staff to teach your course?

The risk we do not have the staff to teach your course is **low**.

We successfully recruit qualified staff to teach on our courses. We provide programmes to support and develop our staff. We work to ensure our teaching staff have, or study for, teaching qualifications.

We reviewed the impact of the result of Brexit on our staffing. We identified no adverse effect. The numbers of EU staff working, or wishing to work, at the University remains stable.

Considering staffing requirements forms part of our processes for approving new courses and modules. There is an annual planning process where we consider teaching

requirements based on courses to be offered and numbers of students. This means we are able to identify and take action relating to staffing in advance of the new academic year.

For research students, the University's priority is always to ensure the completion of the degree. When an academic supervisor leaves the University, a replacement supervisor is appointed for the remainder of a student's study. Where appropriate, we explore whether it would be possible and appropriate for the original supervisor to continue in this role.

What is the risk that a failure of the IT infrastructure might prevent the delivery of your course?

The risk you will be unable to complete your course because of a failure of IT infrastructure is **low**.

We have operational, tested and robust IT business continuity arrangements in place. We run IT crisis simulation exercises to ensure we can address risks to the continuity of our systems.

We have a programme to review our IT resilience and information security, and to take necessary corrective action.

What is the risk that the University might lose its right to teach international students?

This risk applies to our ability to recruit, monitor and support international students who come to the UK on a Tier 4 visa, and our status as a Tier 4 sponsor.

The risk to our losing our Tier 4 Sponsor Licence is **low**. In January 2018, we underwent a Home Office audit of our compliance with visa rules and received a positive outcome. There are no plans to undertake a further visit outside the normal four-year cycle unless additional information comes to light to prompt a visit.

Section 2

Measures to mitigate risks we consider reasonably likely to crystallise

We will continue to monitor developments at Hadlow College, the partner institution that went into Educational Administration. We will review any plans for reorganisation of the College and promote the protection of students.

At present, the risks have not crystallised. If Hadlow College becomes incapable of enabling the students to complete their course, we will act. We may arrange for the transfer of the students to the University. Alternatively, we may agree a transfer to another provider. Where we act, we will do so in consultation with the students affected.

If any of the risks we identify in this plan crystallise, we will act swiftly. As part of our response, we offer suitable advice and support to those affected. The nature of the advice and support will vary from risk to risk and depend on the identified impact. We will

develop our response in consultation with the Students' Union. In doing so, we will provide as much notice as possible in the circumstances.

Section 3

Student Refund and Compensation Policy

What is the Student Refund and Compensation Policy?

The University has a [Student Refund and Compensation Policy](#). This explains how we would compensate you if any of the risks identified above came about. Through adopting a transparent approach, we were able to set out our principles in a single document for the benefit of students.

We keep the Policy under review. We consider advice and guidance issued by official bodies. These bodies include the Office of the Independent Adjudicator (OIA), the Competitions and Markets Authority (CMA) and the Office for Students (OfS). We also consider guidance from representative organisations such as UUK. We periodically review the Policy following relevant case outcomes from the OIA. This is so we can reflect good practice when reviewing the Policy.

The University can call upon contingency and other funds to meet the commitments set out in the Policy. As part of our financial strategy, we retain sufficient cash reserves to meet identified contingencies. If it were impossible to maintain the continuation of study, these reserves would be sufficient to address refund tuition fees and provide compensation.

What does the Student Refund and Compensation Policy cover?

The Policy provides for the following:

- refunds for students in receipt of tuition fee loans from the Student Loans Company
- refunds for students paying their own tuition fees
- refunds for students whose tuition fees are paid by a sponsor
- the payment of additional travel costs for students affected by a change in the location of their course
- compensation for maintenance costs and lost time where it is not possible to preserve continuation of study
- compensation for tuition and maintenance costs where students transfer courses or provider
- commitments to honour student bursaries

Section 4

Communication of Our Student Protection Plan

How does the University publicise the Student Protection Plan?

We publicise our Student Protection Plan to current and future students. We do this by including the Plan as part of the [Terms and Conditions documentation](#). We provide this information for applicants and continuing students. We make the information available on our website.

We consider it is equally important for staff to be aware of the implications our Student Protection Plan. We ensure those with course management responsibilities, including those at partner institutions, receive a copy of the Plan, together with our Change Policy. We provide a copy of the Plan when staff propose course changes in line with the course modification procedures. This forms part of the quality assurance processes of the University.

How does the University review the Plan?

We review our Plan annually. When reviewing the Plan, we undertake a risk assessment as part of the risk management process. The purpose is to identify those risks likely to crystallise. The Senior Management Team approves the Plan on an annual basis.

We review proposed revisions to the Plan with the Students' Union. We undertake this annually through the Students' Union and University Partnership Forum. We consult our students as part of other engagement sessions.

How does the University consult students about material changes and the use of the Plan?

We inform our students of any proposed material changes to their courses by consulting with them at the earliest possible opportunity. This is in line with the [Change Policy](#). We undertake this consultation prior to any material changes.

We give students notice when we need to make material changes to their course. We do this before the commencement of the next semester or academic year.

If we need to implement the measures in our Plan, we consult all affected students as soon as reasonably practicable. We inform students of services of our Student Support Health and Wellbeing Department to support students, both collectively and individually.

In addition, we engage the Students' Union in the consultation process when we need to operate the Plan following a crystallisation event. We continue to discuss our contingency plans for Covid-19 with the Students' Union.

The Students' Union is independent of the University and can provide independent advice and support to students affected. All students, including those at partner institutions, can call upon the services the Students' Union if they require individual support in relation to any proposals.

Department Owner	Governance and Legal Services
Contact Details	Robert Melville, Assistant University Secretary (robert.melville@canterbury.ac.uk)
Document Category	Policy
Subject	The document sets out the approach to student protection arising from risks to the continuation of study for our students, and the measures we have put in place to mitigate those risks that we consider to be reasonably likely to crystallise.
Related University Policies	Change Policy Student Refund and Compensation Policy Complaints Procedure
Approval	2018/19 Student Protection Plan approved by Senior Management Team on 24 April 2018 and by the Office for Students in August 2018 2019/20 Student Protection Plan approved by Senior Management Team on 27 June 2019. Updated August 2019 to take account of developments within the Hadlow Group. 2020/21 Student Protection Plan approved by Senior Management Team on 27 August 2020.
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Website of Latest Version	https://canterbury.ac.uk/students/docs/policy-zone/Student-Protection-Plan.pdf