



Student protection plan for the period 2020-21

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

This Student Protection Plan has been developed to protect the quality and continuation of study of the University's current and future students. The University has identified the following risks that are reasonably likely to occur in the short to medium term and are committed to explaining these utilising a plain English approach:

Institutional Closure

The risk that the University as a whole is unable to operate is very low. The University has sufficient financial resources together with continued funding. As a consequence, the University is well placed to manage its business risk successfully despite the current uncertain economic outlook. Detailed scenario planning has been undertaken as mitigation to strategic risks, focusing on student recruitment, changes to fee structures and events that have the potential to cause costs to spike rapidly. A 10 year strategic plan has been prepared and programmes are constantly subject to review. The Board of Governors and University Senior Management Team are confident that the University is in a position to respond to any changes and remain a going concern. The cash generated in recent years will also support the University in taking a managed and measured response to the possible changes in future funding.

The information relating to liquidity of cash holdings and investments on the University's Balance Sheet (2020) together with two semesters of 2020-21 student loan being advanced in October provides assurance that at least 6 months of operating costs could be covered by reserves without any income, or corresponding change to cost structure, with the later also subject to monthly review. The University's Annual Statement can be found on the University's website.

Revocation of the University's Degree Awarding Powers

The risk that the University is no longer able to award the qualifications for which its students are registered because the Office for Students (OfS) has varied or revoked the University's degree awarding powers is low.

The Higher Education and Research Act (HERA) 2017 stipulates three conditions by which the OfS can revoke degree awarding powers. The University is confident that the quality and standards of its provision is of a high standard. The University is confident that by aligning its policies and procedures to the UK Quality Code, European Standards and Guidelines for Quality Assurance in the European Higher Education Area and the Framework for Higher Education Qualifications the quality and standards of its provision is maintained. In addition the University's Board of Governors have oversight of quality and standards providing assurance of the University's academic governance arrangements.

OfS annual assessment of the annual accountability return confirms that the University meets the criteria for quality, academic performance, course eligibility, financial sustainability and management and governance. Therefore the risk of the OfS revoking the University's degree awarding powers as awarded by Act of Parliament in 2007 is low.

Closure / Withdrawal of a Delivery Location

The risk that the University will be unable to deliver programmes at its Truro site in the next three years is low. Programme delivery has commenced, with ongoing availability

dependent on enrolment numbers and resourcing requirements. The Truro delivery site has been risk assessed and the University is confident that the site is sustainable.

The risk that the University will be unable to deliver its 'Flying Faculty' provision is low within the context of potential loss of key members of staff, impact of insufficient enrolments and resourcing requirements.

Delivery of Subcontracted (Franchise) Provision

The risk that the University will be unable to continue with its scheduled subcontracted (franchise) provision is low. The University has developed collaborative partnerships both within the UK and overseas and operates a five yearly periodic review and revalidation cycle to review both the partnership and programmes offered to ensure that quality and standards are maintained.

However, due to strategic developments, resourcing or issues relating to quality and standards either the University or partner, providing one year's notice, is able to terminate the arrangement at any time. However the risk that the University is unable to deliver its subcontracted provision is low as no future terminations are currently planned, as discussed at the University's partnership specific Strategic Boards.

Closure of Subject Areas / Departments

The risk that the University is no longer able to deliver courses to students in one or more subject areas and/or departments is low. The University has established departments with a range of provision and a strong staffing base. The use of shared modules both within departments and across the wider Academic School demonstrates resilience and will enable adequate resourcing within subject/department areas. Therefore the risk that subject areas / departments will close is low.

Closure of Individual Programmes

The risk that the University is unable to deliver one or more of its courses to registered students is low / moderate this is assessed within the potential impact of low enrolments or non-viability from an academic, student experience or resourcing perspective. The University year on year continues to record increases in applications.

Single Person Dependency

The risk that the University is no longer able to deliver material components of one or more courses, particularly if there are areas of vulnerability, such as single person dependencies for teaching is low. The University has recently developed programmes in new areas, which depend on single members of staff supported by hourly paid lecturers. The risk of a key member of staff leaving or being unavailable due to sickness is low though does present a risk. Academic Schools engage in future planning which incorporates business planning and staff resiliency to mitigate potential issues in this area.

Withdrawal of a Study Mode

The risk of the University being unable to deliver one or more modes of study to students, particularly if withdrawal of a mode of study is likely, is low. The University currently delivers Undergraduate and Postgraduate programmes to both full time and part time students. During validation programmes are designed to ensure that both models of delivery can take place therefore the risk of either mode being either withdrawn or undeliverable is very low.

Suspension or Revocation of Tier 4 Sponsor Licence

The risk that the University is no longer able to recruit or teach a particular type of student, such as international students is moderate / low. Following a visit by UKVI on the 16th February 2018 the University's sponsor licence was renewed for four years. However status which is reviewed annually is dependent on the number of refusals. Due to the small number of International Students applying to the University the implications to the University if a student is refused a VISA is significant. Therefore the risk is moderate / low. Although dispensation in respect of the low numbers involves the potential for not satisfying the refusals percentage threshold this can be discussed with UKVI Home Office where appropriate.

Withdrawal of Designation

The risk of the University's designation for student support purposes being withdrawn or suspended is low. The University via the Annual Assurance Return assures the OfS of its compliance with the terms and conditions of funding for Higher Education Institutions. The OfS annual assessment of the annual accountability return confirms that the University meets the criteria for quality, academic performance, course eligibility, financial sustainability and management and governance, therefore the risk of withdrawal of designation is low.

Loss of PSRB / Professional Accreditation

The risk of the University losing PSRB / professional accreditation for its programmes is low. PSRB and accrediting body requirements are embedded within programmes, where applicable, during validation and revalidation to ensure all requirements from the accrediting body are met. A schedule showing the re-accreditation cycle of all accredited

programmes is held centrally by the Quality and Academic Standards office and reports from accrediting bodies received at the University Board of Studies. This ensures that any identified issues are resolved, and programme and student accreditation is maintained. Therefore the risk of withdrawal of PSRB / professional accreditation is low.

The measures put in place to mitigate those risks considered to be reasonably likely to crystallise

The University acknowledges that a single measure to allow students to continue their studies might not be uniformly appropriate for each student in each instance. Students will have different needs; alternative programmes may be acceptable to some students while others may wish to transfer to an alternative provider. The University will act transparently in discussing options with the student body to minimise the impact on those students affected by changes and closures.

The University is committed to preserve continuation of study for its students and has put in place the following measures to mitigate those risks the University has identified although does not consider to be necessarily of immediate short term risk. The University considers it prudent to be transparent with the student body and mitigate any concerns relating to the identified risks even when of low likelihood.

Institutional Closure

Where the University is no longer able to operate or has decided to cease operating the University will:

1. Where possible implement a process of gradual closure over a specified period, normally no more than 4 years, to allow current enrolled students to complete their studies at the University.
2. Where this is not possible the University will support students in transferring to an appropriate programme at an alternative provider.

3. The University, where applicable, will compensate any student who due to the disruption of their studies suffers demonstrable material financial loss as per the University's Refund and Compensation Policy.
4. Consider merging with another provider to maintain all or part of the current provision.

Closure of Delivery Location

Due to resourcing, academic, student experience or health and safety grounds it may be necessary to close a delivery location or move programmes to alternative locations. The University will endeavour not to close a delivery location or relocate a programme while teaching is underway during an academic year unless in exceptional circumstances.

The University will:

1. Where possible 'teach out' all students currently registered on a programme of study at the delivery location but close the location to any new applicants.
2. Relocate programmes to an alternative location, which may if applicable include hiring spaces for programme delivery and / or installing temporary buildings on site.
3. Following extensive consultation with staff and students revise timetables to allow all scheduled teaching to take place at the current location.
4. Consider whether alternative delivery methods such as distance learning or 'flying faculty' would be appropriate for any affected student.
5. Support students in finding an alternative programme at another provider.

Withdrawal of 'Flying Faculty' Delivery

Due to loss of key staff and / or insufficient enrolments making delivery by Flying Faculty non-viable the University will:

1. Where possible 'teach out' all students currently registered on a programme by relocating programme delivery to the main University campus.

2. Consider whether alternative delivery methods such as distance learning would be appropriate for any affected student.
3. Support students in finding an alternative programme either at the University or with another provider.

Withdrawal of Designation

In the event of de-designation resulting in the withdrawal of statutory student finance the University will:

1. Work with relevant funding bodies to allow enrolled students to complete their programme.
2. Support students to transfer to appropriate programmes at other providers and where appropriate financially compensate students where they suffer demonstrable material financial loss because of disruption to their studies as per the University's Refund and Compensation Policy.

Suspension/ Closure of Programme

Programmes and modules are regularly reviewed and updated by the University to reflect the changing nature of the subject area. In exceptional circumstances the University may need to suspend or close a programme. The University has established and tested procedures in place to support this. If this should happen the University will aim to 'teach out' all enrolled students but close the programme to new applicants.

The University will:

1. Ensure that the decision to close or suspend a programme is discussed fully by the Senior Management Team to identify the full impact on current and future students.

Impact on current students:

2. Ensure current students are allowed to complete the programme of study for which they are registered unless each student provides their written consent to the contrary. Such consent must not be sought until a programme closure / suspension has been agreed by the University's Senior Management Team.
3. Where a programme is being 'taught out' communicate with current enrolled students to provide assurance that they will not be adversely affected by the decision, and provide assurance that they are able to complete their studies at the University.
4. The standard and quality of academic provision and the student experience must, as far as is reasonably practicable, be maintained throughout the student's period of registration. In particular the stated Programme Learning Outcomes and Programme Aims within the Programme Specification must be achievable to students who are being 'taught out'.
5. Where the University is unable to 'teach out' the programme students will be offered the opportunity to transfer to other similar programmes at the University or to programmes at an alternative provider.
6. Where teaching cannot be completed or where none of the proposed options are acceptable to the student the University will consider refunding all or part of the paid fees dependent on the amount of credit and academic progress achieved.

Impact on Applicants:

7. Applicants will be notified in accordance with UCAS deadlines allowing time for students to source an alternative suitable programme at the University or elsewhere. Applicants who have not accepted offers will not be contacted until the closure / suspension process has been fully completed.
8. Where applicants have already accepted an offer, they will be provided with all necessary information, advice and guidance by the University to help them make an informed decision on their future course of action.
9. All affected applicants will be informed of their option to transfer to another programme within the University or to another provider.

Changes in Year to Course Content

The University is committed to deliver the programme in accordance with the approved Programme Specification and Module Descriptors from the academic year in which the student began their programme.

However subsequent to commencement of the programme and during the duration of a student's studies the University may make minor amendments to the programme in order to improve the quality, to meet the latest requirements of the accrediting body; or in response to student feedback.

In the event of in year changes to the programme content the University will ensure that as per the University's Programme and Module Modification Processes and Procedures:

1. All Programme and Module Modifications are approved by the University Modification Forum on behalf of the University Board of Studies. On no occasion will any amendment be processed prior to formal approval.
2. Where such minor amendments to the delivery of a programme are necessary, the University will consult with students in line with University quality assurance processes. This will include, but is not limited to, consultation during lectures and/or at SSLC meetings. Evidence of student consultation will be provided to the University Modification Forum for each modification request.
3. Changes will be restricted to the minimum necessary to achieve the required quality of student experience. Only minor changes to a programme including the nature and weighting of the assessment pattern, module learning outcomes, content, or modes of delivery will be processed.
4. As per the University's Programme and Module Modification Processes and Procedures no more than 60 credits per academic level or 80 credits per year will be processed and no more than 120 credits during the validation cycle (6 years for home provision and 5 years for collaborative provision). Any cumulative changes over this will trigger early revalidation.
5. No major changes to the programme (i.e. changes to the Programme Learning Outcomes or Programme Aims) will be considered without triggering early revalidation.

6. Should early revalidation be triggered existing enrolled students will be 'taught out' on their existing programme.

Suspension or Revocation of Tier 4 Sponsor Licence

In the event of suspension of Tier 4 status, the University will take all reasonable steps to minimise the resultant disruption to affected students by:

1. Contacting current sponsored students within 2 working days of UKVI's decision to suspend or revoke its Tier 4 Sponsor Licence.
2. Providing assistance to affected students in switching to an alternative provider with Tier 4 status. Existing sponsored students will receive a letter from UKVI giving them 90 days to find another sponsor institution.

If the University's Tier 4 status is downgraded, the University will:

1. Work with UKVI to enable enrolled students to be 'taught out' on campus or via distance learning.
2. Work with UKVI to allow students already in receipt of a visa sponsored by the University to enrol and commence their studies.
3. Offer students the opportunity to postpone their application pending resolution.

Loss of Accreditation

In the event of the University losing programme accreditation the University will:

1. Offer affected students the chance to move to an alternative programme.
2. Deliver a modified version of the programme, modified to remove the accrediting bodies requirements (i.e. placement requirements)
3. Provide assistance to affected students in switching to a different provider who offers programmes with the relevant accreditation

4. As per the University's Refund and Compensation Policy, where applicable, compensate any student who due to the disruption of their studies suffers demonstrable material financial loss.

Loss of Key Members of Staff

In the event of key members of staff departing the University or instances of long term sickness where possible the University will:

1. Move current members of staff with the appropriate skills, qualifications and experience, into the vacant post(s).
2. Utilise the University's pool of hourly paid lecturers and/or where this is not possible recruit externally to avoid disruption to the student experience.
3. Where the University cannot avoid closing a programme, students will be offered the choice of transferring to a suitable programme at the University or alternatively transferring to another provider.

Collaborative Partner Provision

Where the University or its partner decides to terminate an arrangement to subcontract (franchise) programme delivery the University will follow its usual policies and procedures to ensure that the interests of students registered for, or accepted for admission to, partner programmes are protected.

The University will:

1. Where applicable ensure that current enrolled students are 'taught out' at their current delivery location.
2. Where the delivery location is unavailable will endeavour to offer students the option to relocate to the University campus, relocate programmes to alternative locations (including hiring rooms for programme delivery via a flying faculty approach) or offer the programme via distance learning.

3. Where this is not possible the University will assist students in transferring to an alternative programme at the University or to another provider.
4. Notify applicants in accordance with UCAS deadlines allowing applicants time to source an alternative programme at the University or alternative provider.

Disruption to University activity

Where events result in programme disruption during a semester, the University will normally consider whether it is practicable to make changes to programme delivery, rather than closing or suspending a programme. The University's commitment to programme delivery via a hybrid model of learning will minimise future disruption to programme delivery.

Actions to minimise disruption will include:

1. Temporary short-term suspension of programme delivery (e.g. where there is a change in the programme delivery location or staffing, with appropriate actions to mitigate impact on students)
2. Changes to the programme delivery location or method (i.e. the use of a flying faculty or distance learning)
3. Changes to the staffing of a programme, for instance through a review of internal staff resources, and the recruitment of additional subject specialists
4. Offering students the opportunity to transfer to an alternative programme
5. Providing support to students in applying to programmes delivered by an alternative provider

Information about the policy in place to refund tuition fees and other relevant costs to students and to provide compensation where necessary in the event of being no longer able to preserve continuation of study

The University, where applicable, will compensate any student who due to the disruption of their studies suffers demonstrable material financial loss as per the University's Refund and Compensation Policy. The policy can be found on the University's website.

The Refund and Compensation Policy makes provision for:

- Refunds for students in receipt of tuition fee loans 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
- The payment of additional travel costs for students affected by a change in the location of their course
- Commitments to honour student bursaries
- 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 have to transfer courses or provider.

The University has sufficient financial resources to provide refunds and compensation to those students who the University have identified at increased risk of non-continuation of study. The University is well placed to manage its business risk successfully despite the current uncertain economic outlook. Detailed scenario planning has been undertaken with regard to possible changes in student behaviour as a result of the new fee regime and a 10 year strategic plan has been prepared. Cash generated will also support the University in taking a managed and measured response to the possible changes in future funding.

The information relating to liquidity of cash holdings and investments on the University's Balance Sheet (2019) provides assurance that at least 6 months of operating costs could be covered by reserves without any income, or corresponding change to cost structure. The University's Annual Statement is published on the website and can be found [here](#).

Information about how we will communicate with students about their student protection plan

Communication to Students

The University will share its Student Protection Plan with current and future students by publishing the Student Protection Plan on the University's website and virtual learning environment (Learning Space).

Current students will be informed of the University's Student Protection Plan during Induction and reference to it will be made throughout the year during meetings with Personal Development Tutors at programme level Staff Student Liaison Committees (SSLC) and the University's Student Experience Council (SEC).

Review of the Student Protection Plan

Our Student Protection Plan will be reviewed on an annual basis and approved formally by both the Senior Management Team and Senate. Students will be consulted via the University's Student Union and via the Student Engagement and Outcomes Panel. The annual review of the Student Protection Plan will ensure that the views, interests and needs of all students are considered and acted upon.

The different needs of students sharing particular protected characteristics (as defined in the 2010 Equality Act) are considered and addressed through internal mechanisms throughout the academic year.

Communication to Staff

The University's Student Protection Plan will be communicated to staff via the staff intranet and all staff will be made aware of the potential implications to the plan when proposing changes to University's provision.

The University's Programme and Module Modification Processes and Procedures documentation will reference the University's Student Protection Plan to ensure that all staff proposing changes to programmes and modules are aware of the potential implications to students.

When discussing the suspension or closure of University programmes the University's Senior Management Team will carefully consider the implications to students prior to approving any changes to the University's portfolio.

Implementation of the Student Protection Plan

Should our Student Protection Plan need to be implemented we will:

- Take reasonable steps to avoid implementing change during an academic year or making changes close to the start of an academic year.
- Inform our students providing at least 45 days notice of any material changes to their programme, modules or location of teaching by posting alerts on the Module and Programme page of Learning Space. Where major changes have been made to a programme the University will contact affected students formally in writing.
- Where delivery location has been modified students will be informed formally in writing providing at least 45 days notice of the change.
- Update our website and presence on UCAS within 2 working days of the decision being made to close or suspend a programme and inform applicants, in writing, of any programme suspension within 2 days of UCAS being notified.
- Where a partner institution through staff changes/ resources is unable to deliver the programme at their premises, at least one full academic year's notice is expected and the partner is expected to bear any expenses related to supporting the students in completing their studies.
- The University will provide all required information, advice, guidance and support to facilitate students in completing their studies.
- The University will fully support students both individually and collectively using the University's established Student Support mechanisms which include Student

Support, the Chaplaincy Centre, the Marjon Student Union and Personal Development Tutors. This will include dedicated sessions to explore options, email correspondence and one on one support. Where substantial change resulting in the need for students to move to an alternative provider (for example University closure) the University will arrange independent advice for all affected students.

- The University has an established complaints procedure which students can follow if they are unhappy with the way in which the University implements its Student Protection Plan. The Complaints Procedure forms part of the Student Regulations Framework and is available on the University's website.