



UNIVERSITY OF
CHICHESTER

Student Protection Plan

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1 INTRODUCTION AND SCOPE

1.1 March 2021 update

The Student Protection Plan and its Risk Matrix are reviewed at least annually to ensure they remain appropriate for the latest assessment of the level of risk to continuation of study of all of the University of Chichester's students. The date of this review is March 2021, and it is informed by any significant changes or issues arising in the period since the previous iteration of the Student Protection Plan was published in March 2020. No additional risks were identified at the annual review point in March 2021.

1.2 What is the Student Protection Plan?

Every university is required to have a Student Protection Plan, approved by the Office for Students, and explaining to students what actions would be taken in the event that a risk to the continuation of their studies arose.

The University of Chichester (the University) takes seriously its responsibilities to support and protect the interests of current and future students. We operate robust policies and procedures with regard to the quality and standards of our courses, admission of students to those courses, the resources underpinning them, and the support that our students can expect to receive from academic and professional services.

The University has established track records with the relevant regulatory and other authorities to provide students and the wider community with confidence in our ability to operate effectively¹.

1.3 Who is covered by the Student Protection Plan?

Our Student Protection Plan covers (irrespective of mode of study):

- Undergraduate Home
- Undergraduate International (including EU)
- Postgraduate Taught Home
- Postgraduate Taught International (including EU)
- PGCE (Teacher Training)
- Degree Apprentices
- School Direct PGCE
- Postgraduate Research
- Students studying through our sub-contracted academic partnerships²
- Students studying through other academic partnership arrangements
- International students studying through UKVI embedded college arrangements

University of Chichester students undertaking Study Abroad or similar are covered by the Student Protection Plan in relation to their University of Chichester programme of study.

University of Chichester applicants who have accepted an offer to study at the University, but who

¹ Office for Students, Quality Assurance Agency, UK Visas and Immigration, Employment and Skills Funding Agency, Department for Education, etc.

² Our list of academic partnerships (franchise and validated) is published online at: www.chi.ac.uk/about-us/policies-and-statements/academic-quality-and-standards/academic-partnerships-0.

have not yet registered, would be informed if the Student Protection Plan is triggered where relevant and changes explained to them.

University of Chichester students who have had their registration with the University terminated (voluntarily, by course completion and/or as a result of disciplinary action, non-payment of tuition fees, academic misconduct, academic failure, or similar) are *not* covered by the Student Protection Plan.

Students registered on courses at the University's validated partner institutions in the UK or overseas are *not normally* covered by the Student Protection Plan. These students may be covered by the partner's Student Protection Plan or similar³. In such situations, we would continue to provide some level of support.

If you have any queries about whether you are covered by the Student Protection Plan, please contact the University's Director of Quality and Standards via acadvice@chi.ac.uk

1.4 What is covered by the Student Protection Plan?

Paragraph 383 of the *Office for Students' Regulatory Framework* lays out a range of provisional risk scenarios that in turn require student protection measures, tailored to the specific circumstances of an individual provider, to be in place. These risk scenarios are that any provider is no longer able to:

- a) operate (or no longer intending to operate)
- b) award qualifications for which students are registered
- c) deliver courses at one or more locations
- d) deliver courses in one/more subject areas/departments
- e) deliver one/more courses, particularly if course closures likely in next 3 years
- f) deliver material components of one or more courses
- g) deliver one/more modes of study, particularly if withdrawal of a mode of study likely
- h) recruit or teach a particular type of student

Minor adjustments and improvements to courses, modules, location or timetable, and changes to supervision for research students, are not covered by the Student Protection Plan. This latter change is covered by our *Research Degrees Code of Practice* (Sections 44, 45 and 95), which details the support that would be provided to a student in this circumstance, and is available from and monitored by our Research Office.

We believe that our students have the right to understand what credible, cost-effective and stress-tested measures are being taking to mitigate risks and how an increased risk would be communicated to them. Students should also reasonably know what to expect should such an instance arise, and the detailed precautionary and operational modelling we have taken to underpin this Student Protection Plan provides assurance that we have appropriate plans in place to ensure fair and responsible protection to students. The measures in the Student Protection Plan are in addition to protections available to students under consumer protection law and do not affect their consumer rights.

³ The University's process for validation requires potential partners to articulate how they would mitigate disruption to studies should such a risk crystallise, and partners are also required to identify their procedures to ensure students are able to complete their studies should disruption (*force majeure* or other) be severe enough to prevent this.

A risk matrix is presented at the end of this Student Protection Plan, plotting the likelihood/impact of a specific risk against impact after mitigation.

1.5 How would the Student Protection Plan be triggered?

If any manageable risk to continuation of study begins to appear likely, and depending on the urgency of the situation, the Deputy Vice-Chancellor (Student Experience) would convene a meeting of the Vice-Chancellor's Group with the Students' Union (President and Vice-President), and any other relevant senior University or Students' Union colleague appropriate to the risk scenario.

Consideration and discussion of the risk, its impact and likelihood, *may or may not generate a decision that the Student Protection Plan should be triggered*. Depending on the magnitude and urgency of the circumstances, consideration could be swift or take up to thirty days. The Vice-Chancellor would take the final decision.

If the Student Protection Plan was triggered, consultation and discussion would continue with the Students' Union, ensuring communication with students was clear, prompt and transparent, and that intended actions, impacts and resolutions were clearly understood from early in the process.

We have a range of pre-prepared scenario plans that would be used depending on the particular circumstances, and Students' Union Officers and student representatives would be fully aided and supported by members of the Vice Chancellor's Group to communicate with students on the scenario in place, as well as what mitigation and support the University is offering to its students in that particular circumstance. The Students' Union supporting statement for this Student Protection Plan is included at Section 5 below.

1.6 Publication and review of the Student Protection Plan

Our Student Protection Plan is made easily available to applicants and students by:

- including a prominent link to the dedicated webpage for the plan on the University's main webpage
- including links to the plan from our webpages dealing with admissions, course information, quality and standards, and student finance
- providing applicants with a link to the webpage where the plan is located when they receive an offer of admission

The plan is given prominence in the University's Quality and Standards Handbook, to which all staff must refer for procedures and advice regarding the closure or suspension of a course, and also for making significant changes to a course.

The Student Protection Plan is formally reviewed at least annually by the Deputy Vice-Chancellor (Student Experience) in collaboration with senior colleagues in Academic Registry, Quality and Standards, and – importantly – with representatives of the Students' Union, with whom we have an excellent and valued relationship.

Should any internal or sector significant changes arise impacting our risk position, we will move to an earlier review, informing the Office for Students and the Students' Union, as the currency of this plan is of considerable importance to protection of our students' continuation of study.

The Student Protection Plan is approved by the University's Academic Board. The Board of Governors receives it annually, whether revised or not, and the link to the Student Protection Plan is provided to all academic and professional staff, with clear details on its importance and relevance to all roles.

2 GENERAL COMMUNICATION AND SUPPORT

2.1 Communication

The Deputy Vice-Chancellor (Student Experience) is responsible overall for operational planning, coordination and delivery of all information, advice, guidance, consultation and engagement. This will be bespoke to the particular scenario (what is or might happen) and measure (activities such as teach out, transfer and so forth, and the activities within this) unfolding at any given time. Delegation to the range of academic and professional services teams within the University should be from this one central executive point to ensure effective and efficient implementation as appropriate, and ensure clear reporting lines to the Vice Chancellor's Group and thence to the governing body. The Deputy Vice-Chancellor (Student Experience) would engage frequently with the Students' Union for communication and action.

In the first instance, if the Student Protection Plan was triggered, the Deputy Vice-Chancellor (Student Experience) would write to all affected students within ten full working days (urgency of scenario/measures would dictate speed at which this first action would take place) with detailed information on the immediate situation and what support, advice and guidance they can expect from the University, what choices they may have, and what plans are in place to protect their interests. How, when and to whom information should be provided, and what mechanisms for consultation and engagement with current students are appropriate to the scenario/measures would also be included, and consideration of the needs of affected students, the impact on them of any emergent or proposed changes, and mitigating and protective measures will form a significant part of this.

A set of common principles apply to information, advice, guidance, consultation and engagement:

- Clear, consistent, detailed and timely communication with affected and/or involved students is of paramount importance, protecting students from undue anxiety resultant from unclear messaging, external misreporting and/or malicious rumour.
- Any changes over time would be communicated immediately in the same way, and the Student Representatives system, the Student Forum, and the Students' Union would also provide for a means by which consultation and engagement with students continues and is enhanced.
- Communication would be inflected appropriately for students at validated or sub-contracted partner providers, as well as for industrial/school placement and Study Abroad hosts, and employers of our degree apprentices.
- Students who have temporarily suspended study for academic and/or personal reasons would receive the same information, advice and guidance as on campus students, communicated electronically to their institutional email addresses.

Depending on the particular scenario and measure, the requisite information, advice, guidance, communication and engagement chain will include variously some/all of the following:

- Carefully crafted initial holding, ongoing and/or daily emails and follow up letter (to students' University email accounts and term-time addresses respectively) to explain and assure on the situation and actions underway and planned.

- All email and other correspondence with students replicated and archived on Moodle so that it may be readily accessed online both on and off campus.
- Frequent scheduled face-to-face student briefing/listening meetings to provide detailed ongoing information on what is happening, why it is happening, what support, advice and guidance students can continue to expect from the University, what choices they may have, what plans are in place to protect them, and to enable a two-way flow of communication, consultation and engagement including follow-up of FAQs.
- Students located off campus for some/all of the time (Degree Apprentices, those undertaking industrial/school placements or Study Abroad, studying part-time, or studying with overseas or national partner institutions, and students who have temporarily suspended study for a variety of academic and personal reasons) would receive the same information, advice and guidance as on campus students, communicated electronically (as it is for follow-up for on campus students) to their institutional email addresses.
- Information provided would be universal as well as specific for each student group, reflective of the specific circumstances, and is followed up to ensure those who miss initial briefings and/or need greater time for digestion and reaction are not disadvantaged.
- Frontline teaching staff, departmental administrators, student support and well-being staff would continue to provide range of academic, pastoral, health and welfare support, financial guidance, and practical advice on student loans status, accommodation leases, etc.
- Communication would reference the University's already existing, and therefore familiar, policies, procedures and processes where relevant.

2.2 Student support at the University of Chichester

We have obligations to all our students: home/international, undergraduates (full/part-time), degree apprentices, postgraduate taught (full/part-time), postgraduate research, students undertaking University of Chichester qualifications through partner institutions in the UK and overseas, and Study Abroad students. We acknowledge, however, that there are under-represented groups of current students, including those with protected characteristics for the purposes of the Equality Act 2010, and some will require additional support in the various scenarios described, for example:

- 51% of our students are local and regional, many from deprived coastal and inland sub-regional areas with HE participation rates as low as 7.6%, and their general vulnerabilities include economic challenge, lack of social capital, geographic immobility, and care leaver/provider and estrangement backgrounds⁴.
- Our degree apprentices are mainly based at the Bognor Regis Campus, some in the Tech Park, and the location and needs of their employers need to be taken into account in any scenario.
- Students studying with sub-contractual providers access the Student Loans Company with fees paid directly to the University, but they are located at another provider and therefore require clear signposting to, for example, that provider's wellbeing facilities (this, while not providing complete parity of experience, is a realistic and practicable solution).

The University also recognises that individual students have complex characteristics and diverse

⁴ The University of Chichester's current demographic is 96% full-time UK-domiciled undergraduates. Part-time students account for just over 2%, with the remainder being International students. Just over one third of our students come from households with annual income of less than £25k and/or from Quintile 1/2 low participation neighbourhoods. Over 53% of our undergraduate entrants are the first in their families to enter Higher Education. While home locality varies by subject, 51% of our students are local and regional, with specific vulnerabilities including economic challenge, geographic immobility, and care leaver/provider and estrangement backgrounds. We currently have 17 care leavers and 38 estranged students.

needs, in particular related to age and maturity, disability and accessibility, and necessary part-time study. The protection measures taken by the University might not be appropriate for all students and therefore reasonable adjustments would be considered where appropriate to individuals, and in full legal compliance with the Equality Act 2010. The Deputy Vice-Chancellor (Student Experience) – working closely with the Students’ Union – will ensure that all measures adopted are inclusive of specific targeted support for under-represented groups of current students, and those with protected characteristics.

The University currently invests significantly in student academic and pastoral support, welfare and wellbeing, student experience, financial and practical advice on the status of student loans and on/off campus accommodation leases, international student support, mental, emotional and physical health including nurses and counsellors, disability, dyslexia and sensory impairment.

A permanent and flexible support staff base – with roles dedicated to student support and wellbeing, outside of those pastoral and academic guidance staff embedded in departments – in itself mitigates risk. Our Chichester campus is situated in close proximity to Western Sussex Hospitals NHS Trust, and we sustain excellent care relationships with this as well as our wider regional NHS networks. We also guarantee every student a personal tutor, recognising the importance of this role in providing a strong crossover between academic and wellbeing support.

Students at sub-contractual partner institutions use provider support facilities and services that are considered in the formation of these partnerships, while Study Abroad students use the local academic link tutor for guidance.

3 RISKS TO CONTINUITY OF STUDY

3.1 The risk to continuation of study for students from institutional closure (market exit)

Paragraph 383 of the *Office for Students’ Regulatory Framework’s* risk scenarios requiring student protection measures, tailored to the specific circumstances of an individual provider, includes that a provider is no longer able to operate (or no longer intending to operate). Clearly, the *impact* on students’ continuity of study from unmitigated market exit would of course be **very high**.

- The range of theoretical threats that could heighten or multiply the risk of market exit includes reduction of market demand, increase of competition, slowing of international and degree apprenticeship growth, negative fee regime change, growth in staff costs and unanticipated pension contributions, loss of Degree Awarding Powers and/or UKVI Student Sponsor license to recruit and register international students, etc. Natural disaster (defined as hurricane, typhoon, cyclone, earthquake, tsunami, flood, mudslide or avalanches), civil disorder, major fire, closure of borders or an act of terrorism are not covered by the Student Protection Plan as these events are outside our normal control.

Detailed scenario planning underpins our consideration of this particular risk as it links directly to the institutional Risk Register’s top priority risks – planned significant growth in student numbers and associated financial sustainability. A range of robust mitigating actions and measures are in place, including highly effective quality and standards processes, and these underpin the *University Strategic Plan* [www.chi.ac.uk/about-us/mission-and-vision/university-chichester-strategic-plan-2018-2025].

Furthermore, a range of mitigations have been put in place for such a scenario to protect our students, where closure is planned over a medium to longer period to permit the following student

protection measures to be initiated through trigger of the Student Protection Plan:

- communication with applicants to cease recruitment
- protection of students' learning, assessment and experience through 'teaching out' to enable certification and exit award
- enabling students to make the best transfer choices to suit their individual needs
- refund and compensation

The *likelihood* of the risk of market exit crystallising is **low** – the University's current positive recruitment picture supports this assertion. Even with mitigation, however, the impact of such an event can only realistically be assigned a risk rating of **very high**.

3.2 The risk to continuation of study for students from closure of one of our two campuses

Paragraph 383 of the *Office for Students' Regulatory Framework's* risk scenarios requiring student protection measures, tailored to the specific circumstances of an individual provider, includes that one or more of the locations at which the provider delivers courses to students is no longer available.

The *impact* on *some* students' continuity of study from closure of one of our two campuses could, of course, be **high**, but the likelihood of the risk to students' continuity of study of campus closure crystallising with the range of mitigations in place is considered **low**. The impact on our students, however, would continue to be **high**.

The University has two campuses, six miles apart, in Chichester and in Bognor Regis. Both campuses host a number of academic departments, and so the future sustainability of either campus is not reliant on the success of a single academic department. Almost all departmental provision is located solely on one or other campus, with some provision in, for example, Musical Theatre, being located across both campuses.

A programme of managed disposal of sub-optimal or unused buildings is underway. The addition of the Tech Park, the Academic Building and the Music Block across both campuses since 2016 means that planned disposals will not decrease the area of our built environment but will upgrade its overall quality and carbon efficiency. The estates asset disposal and rationalisation plan has been developed to align with the University's *Learning, Teaching and Student Experience Strategy 2018-25*, which already guides our space planning activity to ensure both formal and informal learning spaces are suitable and sufficient to support a continually improving student experience. There is no risk to continuation of study arising from this disposal and rationalisation plan.

The University has no plans to close either campus, not least because of the significant public funding (from the LEP and HEFCE/OfS) invested in construction and equipping of the £35m Tech Park at Bognor Regis, and the complex history of the Chichester campus, which was donated to the University by the Diocese of Chichester, acting via its educational trust, the Bishop Otter Trust, and is bound by restrictive covenants that would negate the benefit of such a sale. There would additionally most likely be strong local opposition to loss of revenue generation Chichester and/or Bognor Regis depending on where the campus closure was proposed.

While students and staff could be decanted to one or other campus in the scenario in which a campus was closed, and our estate would have capacity to accommodate classes, with timetable modifications and twilight/ weekend teaching, the location of specialist facilities and equipment on

both campuses poses a problem. The Bognor Regis-located Tech Park houses significant value, fixed assets, in the form of laboratory, studio and computing equipment. Much of this would not be transferable. Similarly, Chichester campus-based sports and performing arts provision, including laboratories and outdoor facilities, are immovable. Student accommodation would also not be sufficient on one or other campus to continue to support residential students in the same way.

Circumstances in which a campus closure is planned over a medium to longer period could potentially require some closure of courses and/or departments, and would permit the following student protection measures to be initiated through trigger of the Student Protection Plan (with details provided in the next Section):

- protection of students' learning, assessment and experience through 'teaching out' of some courses and/or departments to completion or withdrawal
- facilitation of students to make the best transfer choices to other registered providers to suit their individual needs
- arrangement of delivery of certification and exit awards, as well as formal records of achievement for those students who have yet to complete their qualification
- provision of refund and compensation if/when appropriate
- cessation of recruitment and communication with applicants in the pipeline
- sourcing of alternative premises and/or facilities within reasonable distance of the University.⁵

3.3 Risk to continuation of study for students from full or partial merger with another provider

Full or partial merger may be voluntary, wherein the University enters into a partnership with another Higher Education provider, and the resulting institution is mutually formed and mutually beneficial. While this type of merger would most likely see some efficiencies where courses are identical or very similar and can be drawn together, there would *not necessarily be any more than low impact on some of our students' continuity of study* although location of study may alter to be at one or other of the originating organisations. Such eventuality would be potentially covered by student protection planning and measures as per course or departmental closure, and impact on continuation of study for students is considered to be **low**.

Non-voluntary full or partial merger with another provider potentially presents similar levels of potential disruption to study for students as the closure of campus scenario discussed above, and would trigger the Student Protection Plan. This type of merger, however, could present *a number of risks that would have a high impact on some of our students' continuity of study* ranging from closure or 'cherry-picking' of provision to non-achieved, hostile or unsuccessful merger (with consequent closure of the University due to fatal reputational impact).

In any merger there would be a new Student Protection Plan to cover the new entity and risk profile, and it is most probable that a new OfS registration application would be required. The merger process would, of course, determine at what point students move from the protection of the University of Chichester's Student Protection Plan to the new Student Protection Plan, but movement from one SPP to another SPP, under the scrutiny of the Office for Students, *would reduce impact on continuity of study for most students to no more than low/medium*.

⁵ In the case of campus closure, it may be necessary to facilitate 'teaching out' by sourcing suitable premises, facilities, equipment and academic supervision within a reasonable radius of the University. The Director of Estates Management would be responsible for sourcing such premises if required, and the Students' Union would be consulted on suitability of the site.

Throughout a full or partial merger, we would expect the merger partner institution to present a visible and reassuring presence to all our students. We anticipate the Students' Union to be particularly useful in supporting the University's students and brokering good relations with the merging institutions Students' Union (cf. Section 5).

On balance, the University of Chichester considers full or partial merger with another provider to be impracticable: our Anglican genesis and Board members, our geographic location, the general vulnerabilities identified in sections of our student population (including geographic immobility, lower participation and economically-challenged backgrounds), our scale, portfolio and configuration is likely to narrow the field of potential merging institutions considerably, and on balance the likelihood of this risk crystallising is **very low**.

Circumstances in which merger is planned, and depending on the circumstances of the merger, the same student protection measures as for campus closure could be initiated through trigger of the Student Protection Plan, with additional protection measures necessary in arrangement of transfer of formal records of achievement to the 'merging partner institution', cessation of recruitment as the University of Chichester and communication of merger with applicants in the pipeline.

3.4 The risk to continuation of study for students from closure of a course

Paragraph 383 of the *Office for Students' Regulatory Framework's* risk scenarios requiring student protection measures, tailored to the specific circumstances of an individual provider, includes where the provider is no longer able to deliver courses to students in one or more subject areas and/or departments. Such a decision would most likely be prompted by early warnings that form part of the routine trend monitoring undertaken by our Curriculum Planning Group, chaired by the Deputy Vice-Chancellor, and including the Director of Finance, Academic Registrar, Director of Quality and Standards, Deputy Vice-Chancellor (Student Experience) and the Chief Marketing and Communications Officer in its membership.

While course closure is part of the normal 'churn' of portfolio and curriculum refreshment, and the University has robust policies, procedures and processes to deal ably with this as part of 'business as usual' activity. We already do this with **low/no** impact on students who are already on courses. There is a **very high** likelihood that this will continue to be common practice, but the risk of students not being able to complete their course of study in such circumstances is **very low** and robustly mitigated, essentially via strong teaching out practices.

A decision to close a course to new students, either for one year or permanently, can arise for a number of reasons:

- Demand for the course is too small to cover teaching and other delivery costs (market competition impacting recruitment is typically monitored over a three year period, smoothing out between year fluctuations, and providing a clear picture as to the longer-term health of a course).
- External bodies (such as professional, statutory and regulatory bodies) make changes that lead to a recommendation to close or suspend the course and/or potentially adverse external financial forces (such as the introduction of differentiated fees) place unbearable pressure on cost of delivery and income generation capability of the course, so as to be financially unsustainable.

- Curriculum update leads to a change in the range of courses/portfolio balance the Department wishes to provide, and/or staff involved in teaching the course are temporarily or permanently unavailable and it is unduly difficult or impossible to replace them.

Decision and action to close a course is implemented in an orderly fashion, enabling timely adoption of a pre-planned strategy to best protect the interests of the range of student groups, including those under-represented and with protected characteristics in the subject area in question:

- Curriculum Planning Group must be satisfied with and approve the evidence-based departmental rationale for closure, including proposed arrangements for currently registered students and applicants in the recruitment cycle
- This approval must then progress to the Vice Chancellor's Group for final approval
- Currently registered students would be consulted on proposed arrangements to maintain the standard of provision and enable achievement of stated learning outcomes
- Registered students may also provide explicit written opposition and/or request to transfer to another programme within the University or to another institution
- Registered students may furthermore request consideration of fee waivers or refunds, where appropriate

The University has robust teach out arrangements in place to allow continuity of study with no substantive impact on existing students' education and experience, so students would complete their course, with the University planning to ensure their experience is 'gold-plated' as cohorts disappear year by year and closure was completed. This would mean maintaining advantageous student:staff ratios, ensuring facilities and equipment are not diminished, and guaranteeing that the quality of the provision is in no way impoverished during the teach out period. It would be the intention through this strategy to avoid demand for significant transfer activity,

Affordability, as well as the experience of individual students, dictates that students intermitting or undertaking substantial resits could not do so indefinitely, and the terminal period of registration would be determined (one or at most two years) for the additional time these students would require to see through their period of study with the University.

Applicants for a course that is no longer able to recruit for the following year follow this protocol:

- a) Early cycle applicants who have applied to a number of providers would be advised of the position and asked to cancel their application to the University
- b) Applicants holding offers from a number of providers would be advised of the position and asked to decline their offer or withdraw their application, and thereby cancel their application to the University
- c) Applicants who have rejected their other offers and have a 'firm accept' status would be advised of the position, asked to cancel their accepted place, and thereby cancel their application to the University. Applicants may be able to take up their Insurance choice or a previously declined offer (with the consent of the relevant provider), or re-enter the process through UCAS Extra and/or Clearing.

3.5 Risk to continuation of study for students from closure of a department

The University has most recently consolidated some smaller departments into larger cognate disciplinary cluster (institutes), enabling efficiencies of scale while maintaining a broad and therefore resilient portfolio and mitigating the risk of full departmental closure.

A decision to close a department would most likely be as a result of demand for the department's overall academic portfolio being too small to cover cost (with, for example, differentiated fees potentially impacting certain subjects much more heavily than others, and where cross-subsidy of courses within a department is no longer tenable), within a wider context for the University of reduced income and/or other risks to its financial sustainability, and this scenario – referred to in Paragraph 383 of the *Office for Students' Regulatory Framework* – requires student protection measures, tailored to the specific circumstances of an individual provider, to be in place.

Such a decision would require detailed and challenging scrutiny by the Vice Chancellor's Group, and be clearly and demonstrably aligned to the University's strategic direction and/or needs. Perceived or actual risk of students not being able to complete their course of study in such circumstances is **low** and robustly mitigated, essentially via strong teaching out practices, to be **very low**.

Decision and action to close a course is implemented in an orderly fashion, enabling timely adoption of a pre-planned strategy to best protect the interests of the range of student and applicant groups, including those under-represented and with protected characteristics in the subject area in question: the strategic and operational detail of the teach out process is similar to those outlined in the section above, with the additional dimension associated with the loss of a whole departmental disciplinary provision and its impact on students and alumni for whom that identity has been formative.

Going forward, consolidation and reconfiguration of departments is considered a **medium** likelihood.

3.6 Risk to continuation of study for students where there is significant change to advertised courses

The risk that the University would permit significant material changes to compulsory modules within a course (or the course itself, to the extent that the student's ability to continue on the course is impaired) may become necessary should its financial sustainability or viability deteriorate such that action is required. The likelihood of this is **very low** although unmitigated impact would be **moderate**. The following mitigations reduced this risk to continuity of study for our students to **low**.

The University is mindful of its obligations to the Competition and Markets Authority, and has established course approval and change procedures to ensure that such amendments are only made where there is a compelling rationale. Where a significant change is agreed for implementation in future iterations of a course, applicants holding offers or who have accepted an offer, would be informed of these changes at the earliest possible opportunity.

Significant material changes to compulsory modules within courses made following the admission of students would only be made with the consent of the entire cohort potentially affected by the proposed change. Changes of this nature are not otherwise permitted unless the University is compelled to do so in order to respond to changes in PSRB requirements, amendments to relevant legislation, or in the unusual event that one or more members of specialist staff become unavailable to deliver an element of the course at short notice.

In the event that the University does approve significant changes to a course following an offer of admission to that course or registration of students onto that course, the following actions would be taken to mitigate the risks to students and applicants.

- Applicants and students would be informed of change to material information

- Changes would be restricted to the absolute minimum necessary. All other proposed in-year changes would be deferred until the next appropriate iteration of the course
- Both current students, and applicants for the next iteration of the course if they are affected, would be contacted at the earliest possible opportunity confirming the change
- Where it is not possible to secure the agreement of students to the changes, the University would support students and applicants who feel that changes to a course create a circumstance where they wish to withdraw from the course and either transfer to alternative course or seek alternative provision at another provider.
- Support and advice are available from the Students' Union, and redress may in exceptional circumstances include a fee waiver. Students who are not satisfied with the outcome of the internal University Complaints process [www.chi.ac.uk/about-us/policies-and-statements/academic-and-student-support], may wish to lodge a complaint with the Office of the Independent Adjudicator (OIA), an independent body that reviews student complaints.

3.7 Loss of Degree Awarding Powers and/or UKVI Student Sponsor licence to recruit and register international students / Loss of place on Register of Apprenticeship Training Providers (RoATP) for degree apprenticeships

The University has met all assurance requirements set by HEFCE/OfS, and the academic assurances required annually, including those of the Quality Assurance Agency. The QAA does not consider the University of Chichester to be an at risk organisation, and our internal quality and standard governance is strong and intact.

The University's UKVI Student Sponsor licence is overseen by a robust internal governance structure and undertakes regular internal and external audits. The University has a good relationship with the UK Home Office, including a UKVI Premium Account Manager (PAM) and works with applicants to reduce visa refusal risk. The University monitors student attendance closely, both for UKVI compliance and student wellbeing and retention purposes.

This risk has a **very low** likelihood of materialising, and its impact – with or without mitigation – would be **extremely high**.

3.8 Closure of a sub-contracted academic partnership

The University has well-established policies and processes where academic partnerships draw to a close, for whatever reason. In the first instance, this includes the creation and agreement of an action plan and exit agreement, drawn up in collaboration and consultation with the partner, which includes communication with students. The primary choice of the University would be to enable provision to be taught out at and by the partner. If this is not possible, the University would consider a variety of other mechanisms, such as transfer to the University itself, support for students to transfer to an alternate provider, and/or refunds, where applicable.

4. PROTECTION MEASURES

One or more of the following student protection measures would be initiated through trigger of the Student Protection Plan in order to safeguard continuity of study:

- protection of students' continuity of learning, assessment and experience through 'teaching out' to completion of qualification (or withdrawal)

- facilitation of students to make the best arranged transfer choices to other registered providers to suit their individual needs
- arrangement of delivery of certification and exit awards, as well as formal records of achievement for those students who have yet to complete their qualification
- arrangement of refund and compensation if/when appropriate

4.1 'Teaching out'

In typical teach out scenarios, such as we currently have from time to time, we are committed to withdrawing staffing only in proportion to the teach out progression. Other resource – equipment, facilities, teaching space – remains at the level of provision pre-teach out, until such time as it is no longer required for the groups of students the teach out is relevant to. In other words, there is no 'short changing' of students in a typical teach out scenario. Where possible, teaching out arrangements would be in place for a further one to two years beyond the normal course duration to allow for full- and part-time completion with approved study interruptions (for example, related to sickness, permitted deferral, or required resubmission for assessment).

'Teaching out' is our usual and preferred student protection action in all instances as it allows us to continue to teach our students on their courses, and subject to our normal quality assurance processes. Where it is not possible, such as in theoretical full closure of the organisation, transfer to another provider may be enabled, and if this is not possible, refund and compensation may be considered on a case by case basis. Finally, in highly unlikely, extreme and precipitous circumstances, where teach out is impossible, and there is insufficient time before – say – market exit through insolvency commences to complain formally to the University, students may complain directly to the Office of the Independent Adjudicator (OIA).

Courses being taught out would cease to recruit, and UCAS and other bodies (including the Student Loans Company, any relevant Public, Statutory and Regulatory Body, UK Visas and Immigration) would be informed of this immediately. Typically, we would not begin to teach out courses that have already accepted applicants. If, however, this was required by the circumstances triggering the Student Protection Plan, we would contact the applicants in the system, advise that the course is to be taught out. Applicants who have accepted offers would be informed of their options in regard to transferring their application to another course within the University or to another institution. Applicants who have been made offers, but have not yet accepted them, would have the offers withdrawn. UCAS would be notified.

In some circumstances, 'teaching out' could continue at a franchise partner where a course is offered on our campus and the partner's; or the course could be offered at another provider as a validated provision. For Degree Apprenticeship courses, should the employer decide to no longer support the apprenticeship, our agreement is to 'teach out' alongside the traditional degree equivalent on payment of full fee by the affected (ex) apprentice.

The Curriculum Planning Group (CPG) comprises a team of senior and executive managers, who coordinate all activities, working with their teams and across teams to ensure effective and efficient teach out implementation, and to ensure clear reporting lines to the Vice Chancellor's Group and thence to the governing body. In the case of teach out, these are the Deputy Vice-Chancellors (responsibility for academic issues, teaching provision management and student experience/satisfaction, staffing issues associated with teach out), Academic Registrar (responsibility for student registration, certification and records), Director of Quality and Standards (responsibility for complaints and appeals) and the Head of Student Recruitment and Admissions (responsibility for pre-registration applicants to the University who would be impacted by announcement of teach out)

4.2 Certification and exit awards

Should triggering of the Student Protection Plan lead to the need to teach out all or some of our provision, the Deputy Vice-Chancellor (Student Experience) would brief the Academic Registrar to ensure timely production and issue of certification for credits achieved, associated transcript documentation, and/or exit awards. These are important as they underpin each student's ability to transfer credit to study elsewhere immediately or later *should they choose to do so* and enable students who choose to exit Higher Education to enter employment. As important, is that students know that their archived academic records would allow them to access evidence of their academic achievements in the future.

The scenarios in which the University would need to provide exit awards, credit transcripts and certification to existing students who will not have completed their qualification with a formal record of their achievements, and archive academic records to allow graduates to access evidence of their academic achievements in the future, range from our 'normal business' to immediate exit for the English higher education sector.

Depending on the circumstance triggering the Student Protection Plan, rapid assessment and scheduling of Exam Boards could be used to expedite the process, and certification for credits achieved put into place. Academic Registry has already planned for eventualities where all students require urgent copies of exit awards, certificates, records, transcripts as part of their annual risk assessment and mitigation process. We have full confidence in our Academic Registrar's extant disaster planning:

- the University's secure server is 'mirrored' across both campuses to ensure capacity/capability is retained should one or other campus be closed
- SITS, the ChiView student portal and Moodle is accessible remotely by students and staff via virtual desktop while the University IT remains functional
- award certificates, diploma supplements and Higher Education Achievement Records (HEAR) can be uploaded as pdfs and out-printed securely if extra capacity is required
- all student records can be data archived remotely, in accordance with data protection legislation, with a third party
- risk of accelerated pressure on the University's IT system from simultaneous use of all the systems above by all students and staff has been tested and assurance received that this is entirely within 'ultimate' capacity without degradation of performance.

The University currently has robust processes in place for individual students with these requirements, and scale-up/speed-up is possible should this be necessary:

- Students are provided with certification for the credits they have achieved when they leave the University and this is detailed in their transcript documentation.
- Certification is possible without completion of semester, although only to the point of the last awarded credit.
- Exit awards in cases of mid-semester exit capture credit up to the end of the previous semester.

Should the scenario require it

- End of semester assessments can be expedited by acceleration of assessment and scheduling of an Extraordinary Board of Examiners by Academic Quality and Standards Service.

- Normal academic procedures and regulations would be applied in this scenario, with the noted exception of resit opportunity.
- Assessment and preparation of certificates and transcripts would be expedited to ensure students get the most up to date documentation to support their onward transfer, completion or employment.

The Exit Awards, Transcript, Certification, Records and Archive (EATCRA) Task Force will comprise a team of senior and executive managers, who will coordinate all activities, working with their teams and across teams to ensure effective and efficient implementation as appropriate, and ensure clear reporting lines to the Vice Chancellor's Group and thence to the governing body. This Task Force will comprise the Deputy Vice-Chancellor (Student Experience) (responsibility for academic oversight and student experience/ satisfaction); Academic Registrar (responsibility for student registration, certification and records), Director of Quality and Standards and the Data Protection Officer, who is instrumental in ensuring we remain compliant with data protection legislation.

4.3 Student transfer

This section is concerned with *arrangements for and facilitation of informed choice*. We recognise that our students are adults, and that we are obligated to help them exercise their adult rights and responsibilities in transferring, should they so choose, to another provider. We understand that student expectations must be managed as information we provide is not definitive or prescriptive, and we cannot provide direction on choice on a student's behalf. General information about student transfer arrangements can be found on our website here:

<https://www.chi.ac.uk/search/course-search/student-contract-and-protection-plan>

Circumstances that trigger the Student Protection Plan may necessitate transfer or direct entry of our students to other provider(s). Student transfer is, of course, an available choice for all students at any time, and would be supported in the same way whether necessitated or chosen:

- The Deputy Vice-Chancellor (Student Experience) would contact senior equivalents at regional (and potentially other) HEIs, and in the Cathedrals Group of Universities, to communicate the situation and ask them formally to assess their capacity and potentially develop their own plans if they feel they may be able to inwardly accept students subject to their entry requirements and acceptance of credit transfer.
- Early discussions would be scenario-based rather than specific or conclusive, with discussion enabling less typical, more trust-based transfer solutions to be adopted, eg. direct entry transfer into a provider's final year and/or access articulation from our integrated foundation years into another provider's first year.
- Specific messaging to students to ensure no confusion in information to students on transfer support, wellbeing guidance, financial and practical advice also provided to students.

Realistically, some students may not be able to consider transfer of institution, for example:

- Those who come to the University on account of their religious beliefs and this would be a factor in those students' choice of alternative HEIs
- Those who are only able to study locally due to age/maturity, geographic mobility, caring/family commitments, specific disability/accessibility requirements, or necessary part-time study
- Transfer of international students requires immediate direction from the Home Office (UKVI) and the Department of Education, and this may require Office for Students support.
- Alternative HEI supervision for some PGR topics may not be available.

Transfer of international students would require direction from UK Visas and Immigration and this would be sought by the Deputy Vice-Chancellor (Student Experience). Transfer of degree apprentices would require advice from the Education and Skills Funding Agency, and this would be sought by the Deputy Vice-Chancellor (Student Experience). Employers of degree apprenticeship students would be notified straight away, and supported in considering other providers offering equivalent apprenticeships for whom transfer may provide an opportunity as well as a benefit for the apprentices.

We recognise that some student groups may present greater complexity and challenge than others in this particular risk scenario: for example, doctoral students undertaking research in particularly unique areas may find transfer to alternative supervision in another provider problematic, while students who have chosen to study at the University of Chichester because of its proximity to family and/or immovable caring responsibilities are not well-placed to transfer providers, even regionally, and would require tailored support in the form of specific information, advice and guidance.

4.4 Complaints, refunds and compensation

There are several circumstances in which the University would instigate a more pro-active approach to awarding compensation to students. In most instances, refunds and compensation will be broadly similar across affected student cohorts, although reasonable adjustments may mean that in some situations, different levels of refund or compensation will apply depending on individual personal circumstances. These scenarios include:

- Where 'teach out' is not possible in the case of discontinuity of study triggering the Student Protection Plan *and* particular students are unable to transfer to continue their study elsewhere due to reduced geographic mobility/immobility resulting from, for example, care responsibilities. In such instances, if reasonable assessment of equality impact on individual students' circumstances warrants it, we would consider proportionate refund of fees and/or compensation. Where possible, fees refunds will be paid directly to the Student Loans Company and/or other sponsors, rather than direct to the student.
- Where alternative premises/location are provided to enable continuation of study, and students are required to travel to this, we would consider provision of transport and/or reasonable compensation for transport costs, accommodation, maintenance, etc.
- Where such significant changes are made to a course that a student no longer wishes to undertake it, or where a course is terminated unilaterally, a commensurate refund will be made where relevant, and compensation for directly incurred costs considered.
- Where student transfer to another institution occurs as a result of triggering the Student Protection Plan, the University will either honour any University scholarship or bursary payments or make an equivalent payment to the student, providing the terms, conditions and eligibility criteria continue to apply/be met.
- In exceptional circumstances, and at the discretion of the Deputy Vice-Chancellor (Student Experience) to whom a student should apply directly, the University may also make a compensatory payment to acknowledge significant inconvenience, disappointment or lost time (the current policy for compensation typically relies on students to request compensation, and the Student Contract sets out the University's normal responsibilities at www.chi.ac.uk/search/course-search/why-chichester/student-contract).
- Students who are not satisfied with the outcome of the internal Complaints process [www.chi.ac.uk/about-us/policies-and-statements/academic-and-student-support] may wish to lodge a complaint with the Office of the Independent Adjudicator (OIA), an independent body that reviews student complaints.

- The Head of Student Recruitment and Admissions would inform UCAS, the Student Loans Company, the Education and Skills Funding Agency, Degree Apprenticeship employers, partner institutions, and all PSRBs, and would inform all applicants, whether offered or accepted, of the circumstances and advise them to seek alternative institutions.
- The University's Student Tuition and Accommodation Fees Policy addresses refunds, see <https://www.chi.ac.uk/study-us/fees-finance/tuition-fees>

5. Students' Union supporting statement for this Student Protection Plan.

The Students' Union President 2020-21 states:

“We are supportive of and recognise the importance of the University's Student Protection Plan. We have an excellent working relationship with the University and this extends to our representing the student body on all key decision making committees, and contributing to and reviewing the SPP. We feel the SPP is presented clearly, demonstrates a firm basis for action in the face of any potential challenges to the University's continued provision, and that a suitable range of potential risk scenarios have been considered.

Furthermore, the long-standing partnership working arrangements between the University and the Students' Union, together with the firm commitment of early notification and involvement of the Students' Union Sabbatical Officers, Senior Management Team and Student Representatives in the event the SPP were to be invoked/triggered, provide us with confidence there would be a commitment to achieve the best possible outcomes for our students”.

6. Risk impact and probability matrix

In constructing this matrix, the potential (likelihood of risk crystallising, the impact on students' continuity of study of that risk crystallising, and the impact post-mitigation have been evaluated.

Risks to continuity of study	Likelihood of risk crystallising	Impact on students should that risk crystallise	Impact post-mitigation
Risk to continuity of study from the estates asset disposal and rationalization.	LOW	MEDIUM	LOW
Risk to the <u>continuity of study from the University's financial sustainability, reliant on planned growth in student numbers</u>	LOW	HIGH	VERY HIGH (25% of students) LOW (75% of students)
Risk to continuity of study from institutional closure (market exit)	LOW	VERY HIGH	VERY HIGH
Risk to continuity of study from closure of one of our two campuses	LOW	HIGH	HIGH
Risk to continuity of study from full or partial merger with another provider	VERY LOW	HIGH/LOW	MEDIUM/LOW
Risk to continuity of study from closure of a course	LOW	VERY HIGH	VERY LOW
Risk to continuity of study from closure of an academic department	MEDIUM	LOW	VERY LOW
Risks to continuity of study from significant change to an advertised course	VERY LOW	MODERATE	LOW
Risks to continuity of study from loss of Degree Awarding Powers and/or UKVI Student Sponsor licence to recruit and register international students	VERY LOW	EXTREMELY HIGH	EXTREMELY HIGH

