Student protection plan

Provider's name: University of Suffolk

Provider's UKPRN: 10014001

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Student protection plan for the period 2023-24

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

Students are at the heart of the University of Suffolk's mission and ethos, and as such there is a commitment to the delivery of an excellent student experience. Where on occasion events occur which lead to unforeseen circumstances, the University is committed to acting in the best interests of students.

Our student protection plan sets out the measures in place at the University of Suffolk to protect students in the event that a risk to the continuation of their studies should arise. The plan applies to all students studying for a University of Suffolk award at the University or any of our partner institutions. The main risks to the continuation of study for students are outlined below.

- **Closure of the University**
  The risk that the University is no longer able to operate or decides to cease operating is low. Our financial management is sound, as evidenced by internal and external audit findings and demonstrated in our Annual Financial Return 2022 submitted to the OfS in February 2023. This shows that the University is carrying strong cash balances which are predicted to remain that way in the period to 31 July 2026. The University ensures that forecasts of student recruitment and retention are based on realistic assumptions and are set with regard to the wider sector environment. Robust estimates are also made of potential cost increases over the forecast period. We benefit from strong support from local stakeholder groups, including local councils who have invested heavily in the establishment of a university presence in the county as a key driver for regional economic, social and cultural development. We also have business continuity plans to enable the recovery of key business processes following a disaster or incident.

- **Loss of Office for Students (OfS) registration / taught degree awarding powers**
  The risk that the University loses its OfS registration status or taught degree awarding powers is low because we have sound structures and systems in place to manage the institution and ensure alignment with the conditions of registration set by the OfS. We have a demonstrable external track record in effectively managing

quality and academic standards. We operate robust regulations, policies and procedures that assure quality and standards, and have invested in a data analytics platform to enable key performance data to inform quality monitoring and enhancement activity. An annual compliance report to the University Board ensures high level oversight of the University's adherence to OfS conditions of registration, including evaluation of potential risk and associated risk mitigation.

- **Loss of Education and Skills Funding Agency (ESFA) funding for higher and degree apprenticeship provision**
  The risk that the University loses ESFA funding for apprenticeship provision is moderate because of the complex nature of the funding rules, meeting the demands of regular changes and known data quality concerns in early apprenticeship records when funding rule requirements were not fully understood. The University has yet to have a formal audit in this area and therefore currently has no formal, external indication of the success of measures taken to make improvements.

- **Removal from the Apprenticeship Provider and Assessment Register (APAR)**
  The risk of the University being removed from the APAR is low due to the 'good' Ofsted inspection outcome in May 2022. We have a robust process for collating and managing a detailed annual self-assessment review and quality improvement plan (QIP). These processes are led by an experienced management team with relevant expertise.

- **Closure of a location of University study**
  The risk that the University decides to close a location of study is low because we are a small institution operating from a campus which is fit-for-purpose, with the potential for expansion as provision grows. Significant investment has been made into campus facilities including a state-of-the-art Health and Wellbeing building opened in autumn 2022. Where the University delivers provision involving professional practice in the workplace (for example in health), strong relationships with stakeholders ensures continuity of placement provision for students. Strong stakeholder relationships also underpin delivery at sites outside the main University campus (for example the DigiTech Centre established in collaboration with BT).

- **Closure of a course and/or subject area**
  As a relatively small institution with some small cohort sizes, there is a modest risk that the University will make a strategic decision to close a course where it becomes unsustainable. There is also a modest risk of this occurring at some of our smaller partner institutions. However, the risks to continuity of study are low because it is standard practice (as outlined in the University's procedure for the suspension or withdrawal of existing courses) to teach out existing students for the remainder of their studies.

- **Suspension or revocation of the University's Tier 4 sponsor licence**
  The risk that the University has its Tier 4 sponsor licence revoked or suspended by UK Visas and Immigration (UKVI) is moderate. This is because of the reasonably limited number of international Tier 4 students recruited by the University and the resulting potential for individual visa refusals to have a disproportionate effect on the University's overall refusal rate.

- **Loss of accreditation from Professional, Statutory or Regulatory Bodies (PSRBs)**
  The risk of loss of accreditation from PSRBs (for example the Nursing and Midwifery Council and the Health and Care Professions Council) is low because the University

has a sound track record in ensuring that it operates in accordance with PSRB requirements. The University maintains strong stakeholder relationships, for example with commissioning bodies and placement providers in health, with regular monitoring of performance which enables early intervention where any issues arise.

- **Disruption of University activities through sustained industrial action by University staff**
  In light of the ongoing dispute within the sector regarding the Universities Superannuation Scheme, the risk of disruption of University activities as a result of sustained industrial action by University staff is moderate.

- **Disruption of University activities through public health emergencies**
  In light of the national emergence from the Covid pandemic, the risk of disruption of university activities as a result of a public health emergency situation is low.

- **Disruption of University activities through external threats to IT systems**
  The current cyber security risk to the institution is high as a result of very high attack vectors across the education sector, and this is reflected on the institutional risk register.

- **Disruption to course delivery as a result of the unanticipated departure or prolonged absence of key members of academic staff**
  The risk of disruption to course delivery as a result of the unanticipated departure or prolonged absence of key members of academic staff is moderate because of the small size of some course teams within the University and some partner institutions, although our network of partners also brings strength through the sharing of expertise and resource if there is an issue.

- **Loss of access to specialist resources**
  There is a modest risk of loss of access to specialist resources for a small number of courses, predominantly in STEM and health sciences subjects where expensive equipment is used to support course delivery.

- **Termination of a partnership arrangement**
  The institutional risk of termination of a partnership arrangement causing risks to the continuity of study is low. The University strives to develop long-term, stable relationships with partner institutions, and there is careful scrutiny of potential partners in order to effectively manage risk. A mutual commitment to protecting students' interests in the event of termination is outlined in all partnership collaboration agreements. There is a moderate risk that a partner may close a specific location of study, due to changes in student recruitment, business model, and/or local estate restrictions or opportunities.

Routine changes to courses to secure ongoing enhancement will not trigger this plan. The University's approach to making such changes and the required consultation with students is detailed in the procedure for the approval of changes to existing courses. Changes may also be made in consultation with students as part of cyclical University course re-approval processes as outlined in the procedure for the reapproval of existing courses.

2. The measures that we have put in place to mitigate those risks that we consider to be reasonably likely to crystallise

In the event that those risks that we consider to be moderate or modest above materialise, we will take the following steps to mitigate the risks to students' continuity of study.

- **Loss of Education and Skills Funding Agency (ESFA) funding for higher and degree apprenticeship provision**
  Firm and decisive action has been taken by the University to ensure compliance with ESFA funding rules. This has included putting in place a new management team with a strong track record in managing apprenticeship programmes; reviewing the entire learner journey; putting in place training to ensure leaders, managers and teams have a sound understanding of the funding rules and any successive changes; the creation of 'at risk' meetings to closely oversee learner progress; and ensuring robust senior leader oversight through strengthened governance arrangements. Mock audits have been undertaken and resulting robust action plans put in place to mitigate risks.

  In the event that ESFA funding is withdrawn, the University will take all reasonable steps to minimise the resultant disruption to affected apprentices and employers by adhering to all requirements outlined in the ESFA guidance for providers on termination of ESFA funding agreements, including:

  - cooperating with the ESFA as required to facilitate the identification of suitable alternative provision and enable the transfer of apprentices to the new provider
  - continuing to support apprentices affected during the notice period, either until suitable alternative provision has been secured (by the employer or ESFA), or the termination date is reached
  - ensuring the best outcome for apprentices whilst keeping disruption to their learning to a minimum
  - co-operating with ESFA with any requests for information.

- **Closure of a course**
  The University's procedure for suspension or withdrawal of an existing course outlines the approach to handling course closure both within the University and in partner institutions, including arrangements for student consultation. The procedure has been informed by the expectations of the UK Quality Code and relevant consumer protection legislation. In order to seek approval for course closure, course teams are required to provide an exit strategy (as part of a course discontinuation form) which outlines a clear plan for students to be able to complete their course without compromising academic standards and the quality of their learning experience. This exit strategy must be informed by full and early consultation with all affected students.

  In the event of course closure the University will, in the first instance, make arrangements to teach out current students through to completion. This means that we commit to ensuring the course can be completed within the University or at the relevant partner institution by all currently enrolled students, even though the course is being discontinued and we will not recruit any further students to the same course. If the decision to close the course is prompted by concerns about quality or academic standards, we will secure internal and/or external academic advice and guidance in

order to ensure that academic standards are safeguarded and that the quality of the student learning experience maintained during the teach out phase.

If, exceptionally, teach out is not possible, we will support individual students in transferring to an alternative course. Depending on student's individual circumstances and aspirations, this may either be within the University/partner institution or at another provider (utilising student transfer arrangements and facilitating transfer of credit through issue of relevant certification).

In handling course closure and potential student transfers, we will be mindful of the needs of students, including those with protected characteristics, and will ensure full consultation and the availability of appropriate support services (in accordance with our course withdrawal procedure).

- **Suspension or revocation of the University's Tier 4 sponsor licence**
  Robust procedures to monitor international student recruitment, attendance and achievement are in place, in line with UKVI expectations. These have been subject to internal audit where a number of recommendations have been implemented to enhance existing practice. Guidance for staff on UKVI requirements is available on the University intranet (MySuffolk) and training is provided on an ongoing basis. Recent investment in additional oversight of UKVI compliance has further strengthened this approach.

  In the event that the University's Tier 4 licence is suspended or revoked, the University will take all reasonable steps to minimise the resultant disruption to affected international students. This will include, as appropriate:

  - working with UKVI to allow enrolled students to complete their current year of study
  - working with UKVI to allow students already in receipt of a visa based on an allocated Confirmation of Acceptance for Studies (CAS) from the University to enrol and complete their studies
  - offering students who have not commenced travel to the University the opportunity to postpone their application until the suspension or revocation has been resolved
  - providing support to affected students to make an application to an alternative sponsor.

  In all circumstances, we will ensure full consultation with affected applicants and students, as well as the availability of appropriate support services.

- **Disruption of University activities through sustained industrial action by University staff**
  The University has in place established frameworks for consultation and negotiation with recognised trade unions, and is committed to working closely with trade union colleagues to achieve reasonable solutions to matters that may arise. In the event that there is disruption to continuity of study as a result of sustained industrial action, the University will seek to:

  - ensure that normal operations and services are maintained as far as possible
  - take all reasonable steps to fulfil its responsibilities to students in ensuring that any disruption is minimised, and that as far as possible students are not disadvantaged by the action with regards to their academic progress.

- **Disruption of University activities through public health emergencies**
  The University has effective mechanisms for contingency planning in the event of public health emergencies, as evident in the response to the restrictions imposed by the Covid-19 pandemic. Business continuity plans are in place to enable students to continue to engage with their studies through alternative approaches to learning, teaching and assessment, with accompanying adaptations to student support mechanisms. There has been demonstrable success in preserving continuity of study throughout the period of disruption.

- **Disruption of University activities through external threats to IT systems**
  The University has robust business continuity and disaster recovery plans and procedures in place, alongside a strong focus on the mitigation of the cyber risk to the institution, particularly in relation to learning and teaching activities.

- **Disruption to course delivery as a result of the unanticipated departure or prolonged absence of key members of academic staff**
  The University seeks to mitigate the risk of single person dependencies for teaching by encouraging a team-based approach to course delivery. In the event of the loss or sustained absence of key academic staff, the University will seek to fill vacancies or provide temporary cover as soon as possible. We will achieve this through reassigning staff with equivalent skills and expertise, or through internal or external recruitment. In the case of provision at partner institutions, we will work with the relevant partner institution (through the associated partnership management group) to ensure appropriate arrangements are in place to minimise disruption to course delivery.

- **Loss of access to specialist resources (predominantly in the STEM and health sciences areas)**
  The University seeks to mitigate the risk of loss of access to specialist resources through a range of measures including the purchase of high quality equipment (with duplication of vital resources), employment of skilled technicians, maintenance contracts, interim replacement arrangements, the establishment of networks of collaborators, and training of staff and students in appropriate use of equipment. In the event of loss of access to specialist resources and the lack of interim replacement arrangements, the University will draw on collaborative networks to secure temporary access to specialist resources until access is restored internally, or in the case of partner institutions will work with them to ensure appropriate temporary arrangements are in place. The risk of loss of access has been reduced following the investment in campus developments as outlined above.

- **Termination of a partnership arrangement**
  All partnership arrangements are subject to due diligence scrutiny to ensure that there is a sound academic, financial and legal case to support the proposed new partnership in line with institutional and/or school level strategic objectives, in accordance with the approval processes outlined in the University's Partnerships Handbook. Legal agreements underpinning partnership arrangements are all required to include clauses relating to grounds for termination of the agreement and an appropriate exit strategy that ensures that the quality of the experience of students is not compromised in the event of the termination or expiry of the agreement. Exit or transition arrangements would also apply in the case of the closure of a specific delivery location.

In the event of the termination of a validated or sub-contractual partnership arrangement, the University will consider the following options in consultation with the partner institution and the students concerned:

- wherever possible, withdrawing from the partnership in a gradual or phased approach, over a period of time that would allow current students to complete their studies at the partner institution
- where this is not possible, supporting students to transfer to appropriate courses at the University or at other providers (depending on their individual circumstances) and facilitating any associated credit transfer (this may involve courses being delivered via alternative means, including distance or blended learning, where this would be beneficial and acceptable for the students concerned).

3. Information about the policy we have in place to refund tuition fees and other relevant costs to our students and to provide compensation where necessary in the event that we are no longer able to preserve continuation of study

Arrangements for the refund of tuition fees and the award of compensation in the event of course closure or withdrawal of provision are outlined in the University's Tuition Fee Policy, Section E. The University will consider an appropriate award of compensation on a case-by-case basis, informed by the circumstances and context of the situation. For partnership arrangements where the University is the lead institution responsible for the registration of students and the collection of tuition fees, the level of compensation will be determined in negotiation with the relevant partner institution. Where the partner is the lead institution responsible for the collection of tuition fees, students should refer to the Tuition Fee Policy (or equivalent) of the partner provider.

The University's Board of Directors require the institution to maintain a minimum cash balance of 10% of turnover at all times, as a cushion against unexpected events. We would regard refunds and compensation for students who may be affected by non-continuation of study as one such event. At 31 July 2022 our cash balances stood at £43.9m, which is around 32% of turnover.

4. Information about how we will communicate with students about our student protection plan

The student protection plan will be published on the University website to ensure that it is accessible to current and future students. It will also be signposted from other relevant student-facing documentation (such as the Student Hub found on the Online Learning Environment) and in relevant student events (such as induction).

We will ensure that staff are aware of the implications of our student protection plan through incorporation of references to it in relevant University procedures and associated guidance (for example those relating to course modification, suspension and withdrawal).

The plan will be subject to annual review as part of our established cycle of policy and procedure review, and will be reported to both the University Executive and the Senate. Students are represented on Senate, facilitating student input.

More frequent reviews may also be required where there are changes to the University's risk register that have implications in terms of preserving continuity of study for students, in order to ensure a joined up approach. This will be overseen by the Executive.

The University will notify students of any changes which may affect their studies in a timely manner. Should this student protection plan be triggered, individual students will be notified by the Academic Registrar's office via email within two working days. Opportunities for both individual and collective discussion of the implications for students and options to ensure continuity of study will be provided. Advice and support will be available from the Academic Registrar via academicregistrar@uos.ac.uk. Additional independent advice and support is also available from the University of Suffolk Students' Union.

Material changes to courses that do not result in course closure will continue to be discussed and communicated with students in accordance with the timescales outlined in the procedure for the approval of changes to existing courses.

Students with concerns about the implementation of the student protection plan may submit a complaint using the University's established complaints procedure. On completion of the procedure, if a student is dissatisfied with the outcome they may have recourse to the Office for the Independent Adjudicator (OIA), the ombudsman for the higher education sector.