



## University of Bradford: Student Protection Plan

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### **Student protection plan for the period 2018/19**

This paper sets out the University of Bradford's Student Protection Plan which demonstrates how we protect students should a risk to the continuity of their studies arise. At the University of Bradford we place students at the centre of our business and endeavours and therefore we give the highest priority to the protection of our students. The types of event or changes which might cause a risk to the continuation of studies are detailed below.

The plan sets out our assessment of the risks to continuity of study and the steps we will take to mitigate these risks. As an established provider of Higher Education, we have significant experience of effectively managing our programmes and ensuring a high quality student experience. We have drawn upon this experience in developing our Student Protection Plan.

This plan forms part of our Student Contract and is available to all current and potential students. The plan details measures that are in addition to the protections students have under consumer protection law. It is important to note that year on year minor adjustments and improvements to programmes and modules will not trigger the implementation of student protection plan. These changes are made to enhance the delivery of our programmes.

Overall, we are confident that we can assure the continuity of study for our students.

The relevant actions of our Student Protection Plan would be triggered if the risks described actually materialised. Our risk management systems and approach will, excepting extreme unexpected scenarios, allow us to monitor, mitigate and respond to potential events in a measured way, to ensure the interests of our students remain protected.

### **Our assessment of our risks**

As detailed below we have assessed the risks to continuity of study in terms of the likelihood of the risk being realised and the impact the risk would have if it did materialise:

#### Likelihood

We have classified the risks to continuity of study for students on a scale as follows:

- Very unlikely – a risk would only occur in very unusual or exceptional circumstances;
- Unlikely – a risk could occur but we do not anticipate this;

- Possible – there is some likelihood of a risk occurring;
- Likely – there is a realistic possibility of a risk occurring;
- Very Likely – there is a very strong possibility of a risk occurring;
- Definite – we already know that a risk will occur.

### Impact

We have classified the impact that a risk would have on students as follows:

- Insignificant – the impact is such that it can be mitigated through existing processes and procedures through business as usual;
- Minor – we would need to make some specific adjustments to mitigate impact, however this could be managed at Faculty-level, and would not require significant resource (temporal, fiscal or human);
- Moderate – we would need to make adjustments to mitigate impact, requiring some resource, and we would ensure institutional oversight of work undertaken;
- Major – mitigation would require the involvement of our Executive Board, and may require significant resource investment;
- Extreme – mitigation would require involvement of our Council and Senate, and may require external support and resource.

Our risks to continuity of study for students are as follows:

#### Risk: loss of degree awarding powers or University status

Likelihood: Very Unlikely

Impact: Extreme

We have appropriate checks and balances in place, through our governance and management structures, to ensure that we meet our regulatory requirements. The University's Council takes active oversight of the effective governance of the University, reviewing annual accountability returns which provide assurance on the performance of the University.

The University underwent Assurance Review by the Office for Students in 2018 which concluded that reliance could be placed on our accountability information for the purposes of satisfying regulatory requirements.

The University achieved a Teaching Excellence Silver Award (June 2017) the judgements reflected our outstanding track record in supporting students from diverse backgrounds achieve high levels of academic attainment and graduate level employment.

The action plan associated with our 2014 Higher Education Review by the Quality Assurance Agency was fully signed off in 2015.

#### Risk: institutional closure due to financial performance or loss of resources

Likelihood: Unlikely

Impact: Extreme

We have strong financial reserves which enable us to manage year to year variations in income. Although we have returned trading deficits over the last three years, we have developed plans, signed off by our Council, to bring our position into surplus and we have exceeded our latest

income targets for the current financial year, with both recruitment of new students and returning student numbers exceeding target. Our applications for the 2019/2020 academic year show a 10% increase, giving us further confidence that our plans are robust and will enable us to continue to be financially viable and sustainable. Our significant cash reserves and further long term investments of £19 million mean that in the unlikely event that we needed to cease trading we could take a phased approach to closure, enabling us to work with other local providers to ensure that students are provided with opportunities to complete their studies.

We have institution-wide contingency plans in place through our Major Incident Plan and business continuity plans for our estate and infrastructure to ensure that we can continue to operate in the event of a crisis event.

Risk: closure of part of our campus (Emm Lane Campus)

Likelihood: Definite

Impact: Moderate

We have taken the decision to cease to deliver courses at our Emm Lane campus and we will be closing this site within the next two years. This will affect students studying programmes in our School of Management. We believe that this decision will be beneficial to students, as we intend to relocate our provision to our main campus site, which is close by with good public transport links and has more facilities than our Emm Lane campus. Location on our main campus site will ensure that all our students have proximity and better access to our main library, all student services and our Students' Union. All students will therefore be able to complete their studies with better access to our services and facilities. We have assessed our estate and confirmed that we can accommodate the learning and teaching activities from the School of Management within our main campus estate.

Risk: closure of part of our campus (Mid-Yorkshire Hospitals Campus)

Likelihood: Very Unlikely

Impact: Moderate

Our teaching site at Dewsbury Hospital site is a new partnership with Mid-Yorkshire Hospitals NHS Trust, developed specifically to support the workforce needs of the NHS in this region. We foresee the development continuing in the long-term and have no plans to close the site. In the unlikely event of this campus closing, we would relocate the programme which operates at Mid-Yorkshire Hospital to our main campus site to ensure that all students could complete their studies.

Risk: closure of subject area

Likelihood: Unlikely

Impact: Moderate

The University sets an overall strategy and mission on a 5-10 year basis, and reviews its subject and programme portfolio in line with this. We monitor subject areas closely in terms of quality of delivery and financial sustainability. The University has no plans to close subject areas at the present time. Should such a decision be taken, the impact on individual students would be mitigated through our usual arrangements to teach out all existing programmes, ensuring that students can complete their degrees. There is no planned significant change to our subject portfolio for 2018/2019.

Risk: loss of Professional, Statutory and Regulatory Body accreditation

Likelihood: Very unlikely

Impact: Major

We have a strong track record in delivering high quality, professional and vocational programmes, and work closely with our Professional, Statutory and Regulatory Bodies (PSRBs) to ensure that our provision remains in line with their requirements. Over 70% of our programmes enjoy PSRB accreditation and we have a strong history of success in renewing our accreditations over a period of many years. Our staff have strong links with their PSRBs and are in regular contact with the relevant bodies to ensure we are attuned to changes in requirements and modify our provision to maintain compliance.

Risk: Loss or suspension of Tier 4 sponsor licence

Likelihood: Very Unlikely

Impact: Major

We monitor our compliance with our licence requirements closely on a regularly basis and take active oversight of the requirements of our licence. We are performing well against all Basic Compliance measures (currently our refusal rate is at 2.18%, our enrolment rate is 99.65% and our course completion rate is 95.56%), and we undertake regular internal audits to ensure our record-keeping is as compliant with UKVI requirements.

Risk: cessation of operation with overseas partner

Likelihood: Likely

Impact: Minor

We systematically review our overseas partnerships to ensure that they meet our strategic aspirations, and it is likely that we will decide to end our partnerships with some providers. However, where we take the decision to end a partnership, we work closely with the partner and take decisions in consultation with them, which enables us to ensure that existing programmes are taught out, and that current students are able to complete their programmes. This risk applies only to international students studying with partner institutions.

Risk: closure of a programme of study

Likelihood: Likely

Impact: Moderate

We regularly review our provision to ensure its currency and relevance, and we do often make changes to keep provision up to date. This sometimes includes closing programme. We do this to ensure that our students have access to cutting-edge programmes, that we provide programmes in line with student demand and industry need and that our programmes are sustainable. We believe that this is beneficial to students as it ensures that we only offer programmes which are current and relevant and which can deliver a high quality student experience. However, where we decide to close a programme, we always ensure that we continue to deliver a programme until current students have completed their studies.

Risk: inability to secure high quality placements

Likelihood: Very unlikely

Impact: Moderate

We have contractual arrangements in place to ensure the availability of high quality placements and strong partnerships with our placement providers. We work with a number of different placement providers for each programme, ensuring that we are not reliant on a single provider. We continually review and expand the range of placement providers we work with to ensure sustainability of our provision, and audit our providers to ensure quality of experience. Should a

specific placement provider be unable to deliver placements in any given year, we would work with our other partners to secure placements for our students.

Risk: inability to deliver material components of programmes

Likelihood: Unlikely

Impact: Moderate

We ensure that our curriculum is supported by teams of academic staff to ensure that we are able to support delivery, we encourage a team-based approach to research and we ensure that our programmes are designed to not be dependent on the expertise of individual staff. We operate an Academic Workload Model to enable us to flexibly deploy academic staff to ensure continuity of delivery. We are currently in the process of undertaking organisational change, and changes to academic structures are being carefully managed to ensure that we can continue to deliver our programmes.

Risk: change or closure of material components of programmes

Likelihood: Very likely

Impact: Minor

We regularly review our programmes to ensure that their content is current, relevant, aligned to Professional, Statutory and Regulatory Body requirements as appropriate, and to ensure that we are offering the best possible learning experiences for students. As part of this, it is very likely that we will make changes to modules within programmes. We believe that this is beneficial to students, ensuring that their programmes are up to date, linked to innovative research and provide the best possible overall experience. Changes are carefully monitored to ensure they are only made in the best interests of students or to ensure regulatory or legal compliance.

Risk: inability to support PGR Student Supervision

Likelihood: Unlikely

Impact: Moderate

We provide all students with two supervisors to ensure sustainability and continuity should a member of staff leave. Where a supervisor leaves the University's employment, we have arrangements to enable them to continue to supervise University of Bradford students, should it not be possible or appropriate to allocate an alternative supervisor.

### **How we mitigate our Risks**

When we close our Emm Lane campus in the next two years we will move all our current provision to our main campus at Richmond Road. Our University facilities and accommodation are all situated on our main campus at Richmond Road, which is only 1 mile (ten minute journey) from Emm Lane and there is public transport available (buses and train service) for students who live local to the Emm Lane site. Relocating to our main campus will make it easier for students to access our facilities, including our nursery, faith spaces, student support services (counselling, disability support, academic skills support, our Language Centre, international student advice services, financial advice services), and our Students' Union.

We have a University Teach-Out Policy which is designed to protect students should we decide to cease operating some of our provision. 'Teach-out' is a phased method of closing provision which allows current students on a programme which we have decided to close to complete their studies before the closure occurs.

If we decide to withdraw from an international partnership, we will develop a specific teach-out plan to support students already studying on the programme to completion. In the unlikely scenario that we are unable to support teach-out, we will support students to transfer to a suitable alternative institution to complete their studies.

If we decide to close or significantly change a programme, we will develop a specific teach-out plan to support students already studying on the programme to completion. In specific circumstances, this may include substitution of modules, however this will only happen in consultation with students and in such a way that students are still able to meet the learning outcomes of the programme they are studying. Where we have significantly changed a programme, students will be supported to either transfer to the new version or to continue on their original programme to completion through our teach-out planning. This is only ever done in consultation with students and with their agreement.

As set out in our Student Contract, if a student is unhappy with the changes we make to a programme, they have the opportunity to request a transfer to an alternative and appropriate programme (whilst we endeavour to provide this we cannot guarantee that it will be available), to submit a formal complaint through our Student Complaints Procedure, or to withdraw from the programme (any refund will be calculated in line with our Composite Fees Liability Policy, and as set out below).

## **Our Policy on Refunds**

Our refunds policy is set out in our Composite Fee Liability Policy. This outlines the circumstances in which we will refund tuition fees and any other relevant costs to students and the circumstances in which we may provide compensation in the unlikely event we are unable to ensure continuity of study. Our aim is to resolve any concerns or issues through the measures set out in this plan, and see refunds and compensation as a remedy of last resort.

Many students do not complete a full year of study through their own choice, and therefore we have always made provision in our annual budgets for refunds for students where they may be eligible, and will continue to do this. We also have significant cash reserves and further long term investments of £19 million, which ensures that we have the ability to fund refunds and compensation should they exceed the amount we have budgeted for.

The University seeks to minimise change and, where change is unavoidable, puts in place specific plans and arrangements to support and protect students. Under the University's Student Contract, students who are dissatisfied with the arrangements made are entitled to withdraw from the University, and in such circumstances refunds will be calculated in line with the provisions set out in paragraphs 15-24 of this policy. In the unlikely event of the cancellation of a programme requiring the activation of the University's Student Protection Plan, and where the University has been unable to make suitable arrangements for teach-out or transfer to an alternative programme, the University will refund fees paid for the current level of the affected programme but not for any previous levels completed. (For example, where a student has completed Level 4 and is studying Level 5 at the time the programme is affected, the University will refund fees associated with Level 5 of the programme, but not for Level 4). The University will not seek to recover any student Bursary already paid in respect of study which the University is unable to continue to provide. If the student is provided alternative provision of study, at the University or elsewhere, any remaining amounts to be paid under the Bursary will be paid.

In the unlikely event of this Student Protection Plan being activated, the University will consider compensation for circumstances occurring as a direct result of situations set out within the Student Protection Plan. In considering compensation, the University will take into account the context of the situation which has occurred, and any individual circumstances of students. The University will also take into account any mitigating actions which have been put in place to support students. The University will consider a wide range of measures to support students, including assistance with travel costs required by a change to delivery location, and compensation should it not be possible to maintain continuity of study, and will discuss compensation with the student or students affected. Compensation will be benchmarked against guidance from the Office of the Independent Adjudicator for Higher Education.

Where a student is unhappy with the level of compensation offered, a complaint may be submitted under the University's Student Complaints Procedure, under which an independent review of the proposals will be made. Where a student has completed internal procedures under the Student Complaints Procedure, the matter may be referred to the Office of the Independent Adjudicator for Higher Education for external review.

### **How we will communicate with you**

We publicise our student protection plan to current and future students by:

- Including the Student Protection Plan within the Important Information associated with our Student Contract. This is available to prospective students from the point of researching higher education opportunities, and is formally provided to all applicants when an offer of a place is made. Students formally accept the terms and conditions of the contract when they accept the offer of a place, and re-confirm their acceptance at enrolment in each academic year of their studies.
- Through our website
- Through our Students' Union
- In our Student Handbook

We ensure that staff are aware of the implications of our student protection plan when they propose course changes by:

- Revising our modifications paperwork to make sure that specific consideration is given to the implications of students already studying programmes are specifically
- Briefing programme review panels
- Staff training and awareness raising

Our students are involved in the development and review of our Student Protection Plan through:

- Consultation with our Students' Union
- Student focus groups
- Discussion of our Student Protection Plan at Senate (at which our student body is represented)

In line with our Student Contract, we will inform our students if there are to be material changes to their course at the earliest opportunity by writing to them, via email and through our Virtual Learning Environment. We maintain a list of programme changes on our website so that they are easily visible to current and prospective students. We will offer affected students the opportunity to meet with us to understand the changes and how we will be working to protect their interests. We will take the views of affected students into account in the implementation of the changes.

We recognise that some of the risks identified in this plan would have a significant impact on students if they were realised, and this may cause students anxiety and concern. At the University of Bradford, we have a diverse student population, with high representation from Black and Ethnic Minority students, and students from financially and socially disadvantaged backgrounds. We recognise that the realisation of any risk is therefore will have different impact for students from different backgrounds and in differing personal situations. We will therefore seek to ensure that any student affected by such risks is provided with advice and support which is tailored to their individual situation. In addition to the measures we have put in place to mitigate risks, we provide a wide range of support services and our Students' Union will also support and advise students individually and collectively. We will develop a specific support plan to meet any situation which arises.