

## **Student Protection Plan for academic year 2018/19**

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### **Introduction**

As a registered provider of higher education, the University of Hull must publish a Student Protection Plan (the **Plan**) which sets out how continuation and quality of study will be preserved for current and potential students if a risk to their continued study crystallises. As a long established and respected University, we have a wealth of experience in preserving continuation and quality of study for affected students on those rare occasions when we have either ceased to offer a particular area of curriculum or closed a satellite campus. This Plan builds on our experience and is intended to assure current and future students that we have appropriate arrangements in place to protect continuation of study. It outlines the types of risks, gives examples of events that might trigger action and explains what we might do to minimise the impact of these events if they happen. As a 'one size fits all' approach might not protect each student in each instance, our Plan is also designed to take into account the differing needs, characteristics and circumstances of our student community.

This Plan forms an important part of your Student Contract [Terms and Conditions](#).

### **Structure of the Plan**

We begin by explaining two key overarching methods we use to protect continuation of study, those being 'teach-out' and resilience planning. We then explain and demonstrate the types of risks which we strive to protect against in two schedules. [Schedule 1](#) identifies risks we think are very unlikely, unlikely or possible to happen and [Schedule 2](#) covers risks we think are reasonably likely to happen (classified as likely or very likely) and includes details of the mitigation measures that might be applied. You can click on the hyperlinks or visit the end of the Plan to read about the risks in detail. The remainder of the Plan provides practical information about how this Plan will operate, for example, how we will communicate with you and where to seek advice and support.

### **Teach-Out**

In certain circumstances, an educational institution may make a strategic decision to close a programme, a site or even their entire operation. 'Teach-out' refers to the phased method by which such closure will operate, allowing affected students to complete their studies before the closure occurs.

If such circumstances were to arise at the University of Hull, our priority would be to ensure as many of our students as possible completed their programme of study to the original timescale. This priority applies regardless of the type of event with which we might be faced and should be kept in mind when reading this Plan.

Although the circumstances giving rise to the need to 'teach-out' are rare, when they do occur, 'teach-out' will usually be realistic and achievable. An example of exceptional circumstances where we might not be able to 'teach-out' would be if issues relating to

standards or the quality of the academic experience arose. In such a case we would seek to protect continuation of study by offering a transfer on to a similar or replacement programme or by giving support to transfer to an alternative supplier (for example, providing certification of credit or a record of academic achievement).

### **Resilience Strategy**

In addition to the Plan, we have a Resilience Strategy which can be orientated to any event. It is a management framework which is designed to respond to events where normal business processes have failed. In summary, the stages of the Resilience Strategy procedure are invocation, stabilisation, recovery and normalisation. The exact response which would be built around these core foundations would differ according to the event. We may deploy our Resilience Strategy in response to any of the events described in this Plan. We have therefore not explicitly repeated this for each event in the schedules.

### **Hull York Medical School Students**

We operate the Hull York Medical School (HYMS) with the University of York. Students studying on HYMS programmes are registered at either the University of Hull or the University of York (not both). Students registered with us are protected by this Plan and students registered at the University of York are protected by their Student Protection Plan. The contractual arrangements under which HYMS operates require us to work together to coordinate activities and provide the best protection for HYMS students.

### **Categorisation of Risk - How we define "risk", "likelihood" and "impact"**

**Risk** is what might happen, **likelihood** is the chances of it happening and **impact** means the scale of the effect - if it does happen.

We have assessed the risks to continuation of study and classified the likelihood of them happening using this sliding scale.

- **Very unlikely:** an event may occur only in exceptional circumstances (chance less than 10%);
- **Unlikely:** an event could occur at some time (chance between 10-30%);
- **Possible:** an event should occur at some time (chance between 30-50%);
- **Likely:** an event will probably occur (chance between 50-90%);
- **Very Likely:** an event is expected (chance more than 90%).

We have also classified impact on a sliding scale.

- **Insignificant:** resolution would be achieved during normal day to day activity;
- **Minor:** resolution would require coordinated input from faculties and service areas;
- **Moderate:** resolution would require input from a dedicated project team;
- **Major:** resolution would require input from the University Leadership Team;
- **Extreme:** resolution would require input from Council/Senate.

The risks in Schedules 1 and 2 are not exhaustive and there are other risks which may disrupt our activity. Such events may present in any number of guises but would likely result in one or more of the risks already identified. It would therefore be impractical to exhaustively list every possible event.

Further, risks may operate in isolation or concurrently. Our mitigating actions may therefore apply to more than one risk.

### **Refund and Compensation Policy**

We have a Refund and Compensation Policy which can be found on [our website](#). It outlines the circumstances in which we will refund tuition fees and other relevant costs to students and to provide compensation where necessary if we are no longer able to preserve continuation of study. We consider refunds and compensation to be a remedy of last resort and we are committed to doing all we can so that refunds and compensation aren't necessary. The Policy may be implemented as a result of any of the risks in this Plan occurring.

We have always had sufficient finance to refund/compensate students when appropriate and we factor this into our annual budgets on the basis of previous experience and approved plans. In the new UK HE financial environment we are conscious that there could be an increase in such payments so we are now actively investigating whether insurance against relevant costs could be procured. If not, we will target growth in our retained earnings/cash reserves to be able to fund any estimated cost increases. Simultaneously, we are investing in various initiatives that will assist student support and retention and target a decrease in student non-continuation rates thereby reducing the level of refund/compensation payments.

### **Advice, Support and Communication in the event of implementation**

If any of the risks we identify in this Plan happen and their impact on the students concerned is more than insignificant, we will act swiftly and, as part of our response, offer those students suitable and appropriate advice and support. The nature of the advice and support will vary from risk to risk and depend upon the impact and will normally be determined in consultation with our Students' Union. In doing so, we will give as much notice as is possible in the circumstances to inform you what will happen and when. We will always take reasonable steps to avoid implementing change during an academic year or making changes close to the start of an academic year but recognise that this will not always be possible. Affected students, both individually and collectively, will be encouraged to actively engage with discussions about implementation plans. Regular updates will be given via the most appropriate communication method, depending on the nature of the event and a named contact will be assigned.

### **General Communication**

For current and future students, this Plan is available on [our website](#). It is also referred to in undergraduate and postgraduate student handbooks and publicised each year via global e-message.

For staff, this Plan is also available on [SharePoint](#). Annually refreshed plans and any changes which have become necessary following a mid-cycle risk assessment will be drawn to the attention of all staff via the e-Bulletin (email communication with briefing) and made available on SharePoint. We will ensure that staff are aware of the implications of the Plan when they are engaging in relevant activities (such as proposing changes to a course) by delivering training at Faculty Forums and providing signposts in relevant documentation (for example in the Code of Practice for Suspension or Withdrawal of a Programme of Study).



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### **Review**

This Plan will be regularly reviewed to ensure it continues to be relevant, effective and practical. This review will be supported through quarterly risk assessments which align with important dates in the academic calendar. The risk assessments will be carried out by a group comprising representation from each faculty and relevant service areas. The risk assessments will inform an annual refresh of the Plan. The annual refresh will be carried out by the appropriate University Committee which includes a representative from the Students' Union.

### **General Enquiries and Complaints**

For general enquiries regarding this Plan, please contact [spp@hull.ac.uk](mailto:spp@hull.ac.uk). For enquiries which have arisen because this Plan has been invoked, please use the contact provided to you as part of that process. Independent advice can be sought from AskHU or you Faculty Hub.

Details regarding our Complaints Process can be found on the website. This process may be used, for example, if you have a complaint about the way in which we are implementing or not implementing this Plan or the way in which you have been dealt with or affected by an event.



## Schedule 1 - Risks classified as "very unlikely", "unlikely" or "possible"

- Risk:** our degree awarding powers or university status are lost, varied or suspended  
**Likelihood:** very unlikely  
**Impact:** extreme  
**Reason:** the way in which we are governed and operated means that appropriate control, systems and checks are in place to prevent or positively react to an event which would lead to loss, variation or suspension of degree awarding powers or university status from occurring.
- Risk:** we are unable or no longer intend to operate as a whole due to our financial performance  
**Likelihood:** unlikely  
**Impact:** extreme  
**Reason:** the risk of being unable to operate due to financial instability or unsustainability is low because our balance sheet and cash reserves are relatively healthy and compared to sector averages we are lowly 'geared' in terms of long-term borrowings. Historical financial performance has been reasonable and we plan to generate positive net cash-flow from operations for the foreseeable future. We are also well supported by our banks who have provided loans to us on very competitive terms.
- Risk:** our Tier 4 sponsor licence is lost or suspended  
**Likelihood:** unlikely  
**Impact:** major  
**Reason:** a UKVI audit in 2012 and PWC internal audits in 2014 and 2015 reviewed compliance with our Tier 4 Sponsor Licence duties. Our Visa Compliance Team are currently undertaking a comprehensive review of our Tier 4 policy and preparing for an internal audit in May 2018.
- Risk:** loss or suspension of other regulatory licences (e.g. Home Office) or loss or suspension of accreditation from regulatory bodies (e.g. QAA)  
**Likelihood:** unlikely  
**Impact:** moderate  
**Reason:** we are aware of and up to date with the requirements needed in order to be accredited or licenced by such bodies and have processes in place to regularly review and renew such accreditation or licences.
- Risk:** one of our profession body accreditations is lost or suspended (e.g. ACCA)  
**Likelihood:** unlikely  
**Impact:** major  
**Reason:** we are aware of and up to date with the requirements needed in order to be accredited by such bodies and have processes in place to regularly review and renew such accreditation.
- Risk:** we become unable to charge higher amount fees damaging our financial stability  
**Likelihood:** very unlikely  
**Impact:** major  
**Reason:** we are aware of and up to date with the requirements needed in order to charge 'higher amount' fees (for example, publication of an Access Agreement).

**Risk:** all or part of our campus is permanently closed  
**Likelihood:** unlikely  
**Impact:** extreme  
**Reason:** following the strategic, phased closure of our campus in Scarborough, we have no further campus closure plans.

**Risk:** we lose key equipment or facilities (e.g. medical teaching suites)  
**Likelihood:** unlikely  
**Impact:** moderate  
**Reason:** there is only a minimal threat to access to key equipment or facilities for our students (for example failure of or damage to equipment, facility/premises access restrictions by third parties). The equipment and facilities which we provide are generally not "one offs" and alternatives could be found.

**Risk:** issues with partner organisations (for example, validation, TNE/distance taught partners and including issues with partner premises)  
**Likelihood:** unlikely  
**Impact:** moderate  
**Reason:** we carry out and refresh due diligence on partners and include protective provisions in contracts (for example, requirements to give early notice of issues affecting ability to deliver or to commit to 'teach-out') as a matter of course. We also have partnerships staff who have expertise in a wide range of foreign educational and regulatory systems, including territories where we have such partnerships (for example, China). We recognise that some programmes delivered at a distance are designed for that purpose so there may not be a comparable domestic programme to transfer on to should the need arise. Also the type of student affected by this risk are likely to be off-campus making communication and consultation more of a challenge.

**Risk:** non-completion of delivery (i) in one or more subject area (ii) on one or more course, module or material component of a programme or (iii) one or more mode of study  
**Likelihood:** unlikely  
**Impact:** moderate - extreme  
**Reason:** this risk is considered unlikely because we give our students a 'teach-out' commitment. Although our delivery model will inevitably change shape, these improvements are gradual and usually occur over a long cycle and so have little to no impact on the students concerned. Similar to 'business as usual' improvements, we also consider the same risk resulting from unplanned changes to be unlikely because viability and sustainability are planned in advance so are unlikely to occur.

**Note:** this risk is also addressed in our Refund and Compensation Policy

**Schedule 2 - Risks classified as “likely” or “very likely”**

**Bookmarks (click to jump to the detail)**

1. [permanent or temporary loss of key staff](#)
2. [building closure or unavailability](#)
3. [interruption or damage to IT infrastructure](#)

**Table One**

|  |   |   |
|--|---|---|
| <p><b>Risk:</b> permanent or temporary loss of key staff<br/> <b>Likelihood:</b> very likely<br/> <b>Impact:</b> minor - moderate<br/> <b>Reason:</b> unplanned loss of staff is largely out of our control and is a realistic possibility at any given time.</p>  |   |   |
| <p><b>Shape:</b> Loss of staff may impact upon our delivery. Our response will depend on the nature of the problem and whether it is a planned or unplanned event. Planned losses include redundancies, strikes or restructuring. Unplanned losses include for example an unexpected death or a specialist lecturer leaving to take up another post in a different institution. In each case, an impact assessment and an appropriate action plan would be drawn up.</p> | <p><b>Mitigating Actions:</b></p> <ul style="list-style-type: none"> <li>• seek temporary or permanent replacements internally or externally noting that temporary cover may be needed whilst permanent appointments are made as these take time;</li> <li>• providing cover from existing staffing;</li> <li>• adjustment of delivery or content (for example enhanced Canvas/VLE content);</li> <li>• in rare cases more significant action such as material changes to course structure or transfer to an alternative programme or provider.</li> </ul> <p>We have established relationships with educational recruitment consultants. Depending on the scale and nature of the event, we may consult with the affected students in formulating our response and will always try to minimise the impact on our students for example, by carefully timing the event and giving notice where this is possible.</p> | <p><b>Student Circumstances:</b> dealing with this risk is likely to be less problematic for undergraduate courses where staffing is less specialised and generally available in higher volume compared to postgraduate taught and research courses where staff are more specialised and less quantifiable. For example, the loss of a specialist supervisor may have a significant impact on one or a small number of PG students. We already consider staffing as one of our management priorities which is embedded as part of 'business as usual' operations.</p> |



**Table Two**

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| <p><b>Risk:</b> building closure or unavailability<br/> <b>Likelihood:</b> very likely<br/> <b>Impact:</b> insignificant to moderate<br/> <b>Reason:</b> the risk that we will close or not be able to use buildings on our own premises (essentially the Cottingham Road, Hull campus) is possible because we are working on a strategic plan to improve our teaching facilities. This means that building(s) or parts of building(s) may be unavailable or closed during the improvement period.</p> |  |  |
| <p><b>Shape:</b> Our response will depend on the nature of the problem and whether it is a planned or unplanned event. A planned estates issue may be the decision to temporarily close a building/part of a building for improvement or permanently close a building/part of a building because it no longer serves a purpose. Unplanned estates issue may include floods, fires etc. In each case, an assessment of the problem would be taken and an appropriate action plan devised.</p>           | <p><b>Mitigating Actions:</b></p> <ul style="list-style-type: none"> <li>• seeking temporary or permanent alternative premises (whether on-campus or off-campus, hiring spaces, installing temporary structures etc on a like-for-like basis where necessary);</li> <li>• delivery by alternative means or methods (for example, virtually through Canvas/VLE);</li> <li>• revising the timetable to avoid or limit exposure to estates works and scheduling estates work to minimise impact on teaching, students and study;</li> <li>• transfer to or seek temporary support from alternative providers who have the relevant space and equipment.</li> </ul> <p>We already have an Estates Strategy and Plan which caters for planned works. It includes an assessment of impact on students. Certain losses may be covered by insurance which would underpin our ability to respond and recover quickly. Where students incur additional costs in relation to a change in location, the Refunds and Compensation Policy would apply.</p> | <p><b>Student Circumstances:</b> those on programmes which require access to immovable specialist equipment (for example, laboratories, music studios, medical suites) and those with access/mobility needs will need to be given special consideration.</p> |

**Table Three**

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|---|---|--|
| <p><b>Risk:</b> interruption or damage to IT infrastructure<br/> <b>Likelihood:</b> very likely<br/> <b>Impact:</b> insignificant to major (depending on the nature of the event)<br/> <b>Reason:</b> this risk is considered possible given the global threats to cybersecurity</p>  |   |  |
| <p><b>Shape:</b> Our response will depend on the nature of the problem and whether it is a planned or unplanned event. A planned IT issue may be changing the supplier of key software. An unplanned IT issue may be a malicious attack by a third party. In each case, an assessment of the problem would be taken and an appropriate action plan devised.</p> | <p><b>Mitigating Actions:</b></p> <ul style="list-style-type: none"> <li>• structure the timing of implementation to minimise disruption to teaching and students and the impact;</li> <li>• consider alternative means of delivery during the event (for example, face-to-face delivery where the VLE is not available or paper submission where Turnitin is not available);</li> <li>• making the best use of alternative, unaffected systems;</li> <li>• where a third party is involved, we will work with them to minimise downtime and initiate external disaster recovery mechanisms.</li> </ul> <p>As part of the Resilience Strategy, we are building a map of critical services across faculties and service areas identifying dependencies, work-arounds, responsibilities and other information essential to an effective response.</p> | <p><b>Student Circumstances:</b> those on programmes with a high dependency on IT (for example, those on computing programmes) or who rely on IT for other reasons (for example, disabilities or distance learners) will need to be given special consideration.</p> |