

## University of Hull Student Protection Plan

### Introduction

As a provider of higher education, the University of Hull must publish a Student Protection Plan (the Plan, or SPP) 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 consider the differing needs, characteristics and circumstances of our student community.

This Plan forms an important part of the University's Student Contract Terms and Conditions and was approved by the Office for Students on 7 November 2024

Find out more about Student Protection Plans on the Office for Students website at:

<https://www.officeforstudents.org.uk/>

### Who this Plan covers

If you are current student on, or are holding an offer of admission to, any course delivered by the University, at any level, then you are covered by this Plan. This includes any students undertaking reassessment or on approved breaks in study for any reason. If you are studying at a collaborative partner institution which is also registered with the Office for Students, then you will be covered by that institution's Student Protection Plan.

#### *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

### Structure of the Plan

We begin by explaining two key overarching methods we use to protect continuation of study, those being Teach-Out and business continuity planning. We then explain and demonstrate the types of risks which we strive to protect against in an attached Schedule. 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).

## **Business Continuity**

In addition to the Plan, we have a Business Continuity Plan (BCP) that can be orientated to any event. It is a management framework which is designed to respond to events where normal business processes have failed. The exact response which would be built around the elements of the Plan and would differ according to the event. We may deploy our BCP in response to any of the events described in this Plan. We have therefore not explicitly repeated this for each event in the schedules.

## **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 identified and classified the likelihood of them happening as::

- 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.

These factors are then considered together to grade a risk as very low, low, medium or high.

The risks in the attached Schedule 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 no 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.

### **When the Plan is implemented**

The University's Student Protection Plan (SPP) provides an overarching framework for action and provides the basis for the response to any specific set of circumstances that require the activation of the SPP. The steps below are not a definitive list but provide guidance for implementation.

Once the SPP has been activated by the University Leadership Team, it will consider whether the events being responded to require the development of a detailed SPP Action Plan, including consideration of the following steps as appropriate to the situation:

- The University Secretary (or the relevant ULT Risk Owner) will convene the SPP Group with delegated authority to manage the Action Plan that is appropriate in scale and scope to the situation
- The University Secretary will notify relevant stakeholders, such as the Chair of Council.
- The University Secretary will, where required, formally notify the Office for Students of the activation of the SPP and act as the single point of contact with the regulator throughout the operation of the plan.

The SPP Group will then consider the following steps and options when forming and managing the Action Plan:

- Assembly of a response team containing the appropriate skills and authority to act promptly to meet the University's obligations effectively.
- Ensure the development of an appropriately detailed communications plan
- Consider a range of options to protect student interests. Examples might include: full teach out of existing course at existing location; transfer to another related course at the same or different location; transfer to another partner or provider offering a similar course; offer of refunds and/or compensation – in line with the approved Policy.
- Closure and lessons learnt from the Action Plan

### **Refund and Compensation Policy**

The University has 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 the intranet. 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 the intranet. 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 mechanisms including delivering training at Faculty Forums and providing signposts in relevant documentation.

### **Review**

This Plan will be regularly reviewed to ensure it continues to be relevant, effective and practical. The annual refresh will be carried out by the appropriate University committee which includes a representative from the Students' Union. The review will be linked to the University's overarching Risk Management Framework and Institutional Risk Register.

### **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 HUSU or your 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 of risks

Index	Risk	Likelihood	Impact	Overall risk	Reason	ULT Risk Owner
1	Our degree awarding powers or university status are lost, varied or suspended	Very unlikely	Extreme	Very Low	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.	University Secretary
2	We are unable or no longer intend to operate as a whole due to our financial performance	Unlikely	Extreme	Very Low	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.	Chief Finance Officer
3	Our Tier 4 sponsor licence is lost or suspended	Unlikely	Extreme	Low	Internal audit work has reviewed our compliance with our Tier 4 Sponsor Licence duties and found no significant failings, with any minor points having been actioned.  The Basic Compliance Assessment returns to UKVI are monitored regularly and are below threshold for concern	University Secretary
4	Loss or suspension of other regulatory licences (e.g. Home Office) or loss or suspension of accreditation from regulatory bodies (e.g. DQB)	Unlikely	Moderate	Low	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	PVC-Education
5	One of our professional body accreditations is lost or suspended (e.g. ACCA)	Unlikely	Major	Low	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.	Relevant Faculty Dean
6	We become unable to charge higher amount fees damaging our financial stability	Very unlikely	Major	Very Low	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).	University Secretary

7	All or part of our campus is permanently closed	Very unlikely	Extreme	Low	No campus closures planned and University has gained significant experience in responding to Covid-19 pandemic	PVC-Education
8	We lose key equipment or facilities (e.g. medical teaching suites)	Unlikely	Moderate	Low	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.	Relevant Faculty Dean
9	Issues with partner organisations (for example, validation, placement providers, London Study Centre, TNE/distance taught partners and including issues with partner premises)	Unlikely	Moderate	Low to medium	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 staff who have knowledge in a range of foreign educational and regulatory systems, including territories where we have such partnerships. 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 is likely to be off-campus making communication and consultation more of a challenge.	Chief Operating Officer
10	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	Unlikely	Moderate	Low to medium	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	PVC-Education
11	Permanent or temporary loss of key staff	Very likely	Minor	Low to Medium	Unplanned loss of staff is largely out of our control and is a realistic possibility at any given time.  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	Exec Director - HR

					<p>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>	
12	Building closure or unavailability	Moderate	Moderate	Medium	<p>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 the building(s) or parts of the building(s) may be unavailable or closed during the improvement period.</p> <p>Our response will depend on the nature of the problem and whether it is a planned or unplanned event.</p> <p>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 issues may include floods, fires etc. In each case, an assessment of the problem would be taken and an appropriate action plan devised.</p> <p>The University has alternate arrangements in place with CEG in the event of significant disruption to the London Study Centre</p>	Chief Operating Officer
13	Interruption or damage to IT infrastructure	Likely	Depends on nature of event	Medium	<p>This risk is considered possible given the global threats to cybersecurity.</p> <p>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>	Chief Operating Officer