

# Student protection plan

Provider's name: Keele University

Legal address: The University of Keele, Keele, Staffordshire, ST5 5BG

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

The University has robust processes in place for managing its risks, particularly for those that would impact on the continuation of study for our students. The University regularly reviews its risk register, via the University's Risk and Compliance Group, the University Executive Committee and the University Council's Audit and Risk Committee.

We consider that our University as a whole is at very low risk of being unable to operate. Our published financial statements demonstrate an extended record of sound financial management and performance.

There are a number of risks that could impact on the University's ability to operate as it does now; these risks include the loss or restriction of University status, loss of our UK Home Office Visas & Immigration (UKVI) sponsor licence, cancellation of our OfS registration. These are all deemed to be low risk, due to the policies and procedures put in place by the University to manage these risks. As part of its risk management processes the University engages its internal auditors UNIAC to audit these and other areas of potential risk.

The risk that we are no longer able to deliver programmes in a highly specialised area, (e.g., Medicine, Nursing, Midwifery, Pharmacy etc.) is low due to the University having strong relationships with placement provider partners and engagement with the Professional, Statutory and Regulatory bodies (PSRB) e.g. programme validation processes and in some cases senior academic colleagues are PSRB assessors. In each School, the Head of School or senior professional leads are either represented or linked to the relevant PSRB. This means that the University is often represented on the committee which decides and approves any changes to the academic standards process. Schools within the University review the PSRB requirements to ensure that the University programmes continue to fulfil the prerequisites of the relevant body. The University also has in place institutional oversight, where all PSRB reports are sent to the University's Quality Assurance team and any recommendations or conditions made are reviewed and discussed at the University Quality and Academic Standards Committee (QASC).

The risk that we are unable to deliver an undergraduate programme due to the unanticipated departure of key members of academic staff is low because the core modules are generally taught by integrated teams of academic staff. However, there is a moderate risk that some of the optional specialist modules would no longer be available if the University was unable to recruit a replacement who had expertise in this specialism. This would also be the case with regard to delivering specialist postgraduate programmes.

The risk that the University would make a strategic decision to withdraw a programme with immediate effect is low (this includes Keele programmes offered via a partner either in the UK or overseas), as the University manages such circumstances by, for example, 'teaching out' a programme and offering continuation of study for our students as a well-established priority.

The risk of the University making changes to a programme is moderate, as we continuously review our teaching provision to ensure programmes are 'current' and of a high quality. These changes could include amendments to modules or module choice. The possibility of a change to the mode of study is low and likely to be temporary. For example, if there was an IT problem for students studying via remote learning, this may mean some short-term disruption whilst an IT solution is sought. If this had an impact on any assessment deadlines then extensions would be considered where applicable.

The risk of the University having to temporarily close a site, building or facility due to a fire or other major incident, other damage or health and safety issues is a reasonable possibility. However, we have established business continuity plans in place for such eventualities and we consider this is unlikely to affect the continuation of a student's study; measures have been further strengthened as a result of managing business continuity during the Covid-19 pandemic. Where we operate on sites that we do not directly own, notably through our delivery of medical programmes at the University Hospitals of North Midlands NHS Trust, again there are established business continuity procedures in place. We consider the risk of these buildings being unavailable for University use is also low, because the University has long term lease arrangements (of at least 60 years).

The risk that a student's study is disrupted due to industrial action is normally low, as the University maintains good employee relations. However, external events, beyond the University's control may lead at times to a period of industrial action.

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

We will take reasonable steps to minimise the impact of any significant risks. However, in the event that a significant risk arises that cannot be mitigated, the University will provide the following tested and viable actions:

- Where a strategic decision is taken to withdraw a programme of study or discipline we will pursue the option to 'teach out' that programme or discipline, enabling current cohorts to complete their award.
- We may offer a modified version of the programme of study or offer an alternative programme at the University.
- We would support students in finding an alternative programme at another provider; this may include negotiating with the provider on the student's behalf.
- If necessary, we would negotiate with another institution to provide continuation of study, in consultation with the relevant students.

There are additional measures that we may also take in the following circumstances:

### **i/ Loss of accreditation from a regulatory body**

Should the external accreditation of a programme be removed, the University will make reasonable endeavours to find an alternative accrediting body.

Where external accreditation is compulsory for progressing to a particular profession<sup>1</sup> including but not limited to e.g., Medicine, Nursing, Pharmacy, Physiotherapy, Radiography, Social Work, Law, an alternative provider would be sought and necessary arrangements would be made to transfer students to that provider.

### **ii/ Location of study changes**

In the event of the University changing a location of study due to either a site closure or a merger with another institution, we would take the following actions:

- We would consult with the relevant students and make appropriate impact assessments.
- We would make an assessment of the space and facilities to ensure its compatibility with the programme's requirements.

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<sup>1</sup> Where a programme of study has recruitment restrictions imposed by the government/professional body e.g. GMC for Medicine, finding an alternative provider would be difficult and in those cases we would therefore liaise with the relevant authorities to negotiate whether, for example, these restrictions could be lifted for that provider/those providers.

- We may also consider either offering transport from the campus to the new venue or reimbursements of additional travel costs if applicable.

### **iii/ Temporary closure of site/building/facility**

Where a site or building is closed temporarily due to damage or health and safety issues, the University would take the following actions:

- Relocate provision to another site or building within the University or hire a nearby space. Staffordshire University and Keele University have a reciprocal arrangement where each institution will try and accommodate<sup>2</sup> each other's affected students where possible. The University may also consider either offering transport from the campus to the new venue or reimbursements of additional travel costs.
- Review and revise the timetable to allow all teaching activities to take place in the available space. This may involve teaching taking place outside the normal 'academic times' e.g. evenings and weekends. The University would consult with the relevant students and undertake appropriate impact assessments.
- Alternative delivery methods would also be considered where appropriate e.g. online learning etc.

### **iv/ Unanticipated departure of key members of University staff**

When a key member of staff departs the University we will endeavour to:

- replace that member of staff as quickly as possible.
- move other suitably qualified staff to cover the teaching where possible.

As already noted, because our programmes are taught by integrated teams of academic staff, we would not normally expect the departure of a single individual to impact on the core elements of a programme. In a small number of cases, where a replacement of a specialist member of staff is not possible, in the short-term the university may need to make amendments to a programme. In extremely rare cases where we would be forced to close/suspend a programme, we would support students in finding a viable alternative programme either within the University or at another provider.

### **v/ Major modification of a programme**

As stated previously, the University will use reasonable efforts to deliver the programme in accordance with the Course Information Document and programme specification. However, we continuously review our teaching provision to ensure programmes are 'current' and of a high quality. As a result of this ongoing review, where necessary and reasonable, we may need to make changes to the Course Information Document and to the programme from time to time.

If the University makes changes to a programme it will:

- aim to keep the changes to the minimum necessary

notify students of the change as soon as possible and engage with the students in order to respond to any questions that they may have on the impacts of the change.

- take reasonable steps to minimise the impact of any major modification by providing reasonable and proportionate support, which could include helping students find an alternative programme or institution or by offering the student the chance to withdraw from the programme. Should students withdraw from their studies during the academic year, then students may be eligible for a refund of tuition fees in accordance with the arrangements described in the [Student Agreement](#).

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<sup>2</sup> Particularly specialist facilities e.g. laboratories.

## **vi/ Industrial Action**

In the event of industrial action by University staff we would aim to minimise disruption to students' studies and services and manage such a situation in accordance with the University's Management of academic programmes, progression and awards during interruptions to normal business and timescales (INBAT) Policy. Where there is prolonged industrial action, the University will put in place appropriate measures to protect students from being disadvantaged by the action. This could include:

- Classes, lectures and learning materials missed due to industrial action will be rearranged where possible or replaced with a suitable alternative following the action, in order to ensure that students' learning objectives and learning opportunities are fulfilled.
- Staff will be asked by their Head of School or line manager to prioritise key activities according to agreed timescales to minimise disruption to students' studies.
- Assessments will be reviewed and amended to ensure that any topics missed or not adequately covered by alternative learning activities are not included.

### **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**

Our approach to offering refunds is set out in our Student Agreement (Terms and Conditions), in our Refunds Policy (which covers overpayment of fees) and in our Tuition Fee Charging Policy (which covers the refund of fees in the event of student withdrawal or transfer).

We do not have a fixed policy in terms of offering compensation where study is disrupted. Rather, we consider individual cases for compensation through our student complaints process.

The University also has in place 'Business Interruption' insurance which insures against a loss of revenue to the University in the event of a major incident. This would enable the University, in the case of such an incident, to either set up alternative teaching arrangements, cover transport costs or, if applicable, refund fees.

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

The University's Student Protection Plan has been developed with the input of our Student Voice Committee (a sub-committee of our Senate which includes a range of student representatives). Our 'Student Protection Plan' is published on the University's website, alongside the University's Student Agreement (Terms and Conditions) and Regulations. Current and future students will be signposted to the Plan via our annual mailings; for new students this will be at the same time as they are mailed their Student Agreement and Course Information Document and for returning students this will be included in the same communication as their re-registration information.

The University provides all key staff within the Schools and Faculties (e.g. Heads of Schools, Deans of Education, Heads of Faculty Operations and Faculty Operation Managers) with a guidance document regarding curriculum changes, which will in the future include the Student Protection Plan.

We consulted with students through our Student Voice Committee and through the student members of our governing body in making our application for initial registration to the Office for Students. The University will annually review its Student Protection Plan. As part of this review, Academic Registry and Legal, Governance & Compliance will consult with a variety of internal stakeholders including the Students' Union and Keele Postgraduate Association, and other representatives on our Student Voice Committee. The Student Protection Plan is approved by the University Executive Committee.

If the University was required to implement its Student Protection Plan, affected students would be notified in a timely manner and provided with appropriate support as detailed in section 2. The University will also signpost affected students to the Student Unions' Advice and Support at Keele Office (ASK) for independent advice.