



STUDENT PROTECTION PLAN

2022/23

NB. The document is available on the University of Cumbria Website. It should be noted that any printed copies are uncontrolled and cannot be guaranteed to constitute the current version.

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Student Protection Plan for the 2022/23 Academic Year

The University of Cumbria is a dynamic, creative and entrepreneurial institution, rooted in our region, with strong national and international connections. Located in Carlisle, Lancaster, Ambleside in the Lake District, London, Workington and Barrow-in-Furness, the University of Cumbria supports many 'first in family' university students, ensuring they have the best support to complete their studies. We are committed to working across the whole of Cumbria and the regions of North Lancashire; to the continued development of our London-based activities; and to working with our educational partners across the UK and overseas. The broad geographical reach of our activities is reflected in our teaching, learning, research and assessment methods: our taught and research degree programmes are designed to be delivered and assessed through blended, flexible and distance-learning, as well as campus-based activities.

The University's new Strategy, Towards 2030 <https://www.cumbria.ac.uk/t2030/> sets out our commitment to delivering long-term institutional sustainability and success through:

1. providing an appropriate and accessible academic portfolio and educational offer, which capitalises on place and meets individual, regional, sector and employer needs;
2. providing an excellent learning and teaching environment and student experience, equipping our graduates with the skills, attributes, confidence and resilience to succeed on graduation and beyond;
3. working in strategic partnerships with employers, education providers and stakeholders to optimise capability, offer and outcomes;
4. a strategic focus on digital, with digital technologies and applications used to enrich and enable our portfolio, programme access & delivery, curriculum, operations, working practices, environments, and campuses;
5. addressing carbon reduction and sustainability, through our portfolio focus and curriculum, research and knowledge exchange, graduate attributes, and business operations;
6. promoting positive health & wellbeing through our portfolio focus and curriculum, research and knowledge exchange, work practices and environments;
7. working in partnerships based on trust and mutual benefit; at the heart of our mission is working with and through others, to draw on our geography and assets, build capability and to address big issues and challenges; and
8. equipping and enabling our staff to succeed, and celebrating success.

1. Introduction, risk assessment and scope

The Higher Education and Research Act 2017 requires all higher education providers to produce and publish a Student Protection Plan which articulates how a provider will preserve the continuation and quality of study for students. In developing this Plan, the University has considered the range of potential scenarios set out by the Office for Students and has, for each, assessed the risk and impact, however unlikely the scenario. Towards that end, this Plan sets out a range of potential scenarios which, if realised, could impact upon continuation of study for students. For each scenario the Plan includes a range of measures that would be considered to mitigate the impact on the continuation of study for students, should the scenario be realised.

This plan does not extend to short-term disruption to students, such as loss of use of a building, which forms part of the University's Business Continuity Planning arrangements.

Sometimes it may be necessary to make minor changes or adjustments to programmes of study and other services and facilities which do not amount to changes to programme aims or programme learning outcomes. Minor changes may include, for example, changes to timetable, number of classes, changes to module assessment and method of delivery (provided any alterations are reasonable). The procedures for this are set out in [Procedures and Processes for the Validation of Credit Bearing Academic Provision \(Taught Programmes\)](#). This plan does not extend to minor changes. The University's regulations and procedures for postgraduate research degrees form part of the Manual of Academic Regulations and Procedures as set out in the [University's Research Degrees Handbook](#).

It will be less common for the University to need to make material or major changes to its provision, services and facilities in response to unforeseen or changed circumstances. Material or major changes can arise following strategic decisions and can arise from necessary changes to the University corporate structure, regulations, policies and procedures (for example, as a result of changes in the law or Government requirements). Such major changes may be within the scope of this Plan, as set out in the scenarios below.

The University has well established procedures for assessing risks, if there are any early indications of the potential for a risk to materialise that may impact on continuation of study the relevant institutional services and senior staff will work to mitigate the risk(s), as appropriate. In the event of any of the risks in section 2 materialising, the University of Cumbria is committed to preserving the continuation of study for all current students and minimising any disruption and/or disadvantage. The University is committed to communicating and consulting with students as early as possible should any of the risks materialise, and students will be provided with support and guidance from the University and Students' Union, as appropriate.

Equality Impact Assessments will be undertaken, should any of these risks materialise, to ensure that the diversity of students and their needs are considered, for example, considerations of mobility, educational need and student wellbeing. Through this process the University would consider the likely impact on a whole student cohort and on particular student groups, e.g. students with carer responsibilities, and would seek to put in place appropriate measures and remedies. Where the measures and remedies put in place by the University are, for justifiable reasons determined by individual circumstances, deemed not satisfactory, the student would have recourse to the University's Refunds and Compensation Policy (see section 3).

The Plan covers students studying on University of Cumbria programmes. Where students are studying as part of a collaborative provision arrangement, whether the provisions of the University or the Partner's Plan would be invoked is set out in Appendix A.

2. Potential scenarios which could represent a risk to the continuation of study

The range of potential scenarios which, if realised, could impact upon continuation of study are set out below, along with the measures that the University would expect to put in place should the risk materialise.

- 1) The University as a whole is no longer able to operate, or chooses to cease operations

The University has a strong track record of delivery of high quality programmes and has achieved successful outcomes from external quality assessments including those undertaken by the Quality Assurance Agency and Ofsted. The University has adequate levels of cash resources and borrowing facilities and adopts a detailed and comprehensive approach to managing its finances to ensure that on an annual basis expenditure does not exceed income.

In the event of the University no longer continuing to operate, the University would put in place measures such as:

- Work with the Office for Students to deliver a planned, incremental implementation of closure to allow all registered students to complete their studies at the University;
- Look to merge with other providers of higher education in the region; and / or
- Support students to identify and transfer to alternative providers.

These measures would mitigate the impact on students and focus upon enabling them to complete their studies.

2) Material change to location of delivery (through closure of a location or a change in location of delivery for a particular programme)

The University operates in four main geographic locations, Carlisle, Lancaster, Ambleside and London and additionally delivers a number of programmes from smaller sites in Workington and Barrow in Furness. The University Board approved a new Estate Strategy in July 2018 that set out the University's intention to maintain its presence in these locations. The Strategy includes the intention to consolidate onto one campus in Carlisle, however the distances between the existing and any new campus location will not be significant and plans are at very early stages of development.

The University is not currently planning to relocate any of its programmes for continuing students.

In the event of the University making the decision to cease delivery at one of its locations or change the location of delivery for a particular programme, the University would consider measures such as:

- Planned, incremental implementation to allow all registered students to complete at the original location;
- Transferring delivery of affected programme(s) to another University location with provision of travel and accommodation where appropriate and/or recourse to the University's Refunds and Compensation Policy for additional costs (e.g. extended childcare costs);
- Transferring delivery of affected programmes to another designated venue with provision of travel and accommodation;
- Supporting students to transfer to alternative providers;
- Delivery in alternative modes, e.g. distance learning, to enable all registered students to complete their programme.

These measures would mitigate the impact on students and focus upon enabling them to complete their studies.

3) Loss of UKVI (UK Visas and Immigration) status

NB: International students require a Tier 4 Visa to study in the UK. The University's Tier 4 licence covers Lancaster, Ambleside, Fusehill Street and Brampton Road campuses only

The University takes a risk-based approach to its sponsorship duties and has systems, checks and controls in place to manage the risk of licence withdrawal. These include, but are not limited to:

- Demonstrating our integrity by ensuring we:
 - Accept only students who can evidence a legitimate ability to study at the University;
 - Enrol all students to whom we issue Confirmation of Study certificates (CAS);
 - Monitor students to ensure they remain eligible for the duration of their studies and that they comply with their visa requirements;
 - Support students through to course completion;
- Including UKVI Compliance in our routine process of internal audit to ensure that our controls remain fit for purpose and effective;
- Ensuring marketing and website information accurately reflects our status as a Tier 4 sponsor.

In the event of the University losing its UKVI status, the University would consider measures such as:

- Working with the UKVI to allow registered students to complete their programme of study with the University within the UK;
- Working with the UKVI to allow registered students to complete their programme of study via supported distance learning from the student's country of domicile;
- Working with the UKVI to enable the transfer of any Tier 4 students to a different provider with minimal disruption to the student.

These measures would mitigate the impact on students and focus upon enabling them to complete their studies.

4) Loss of Professional Accreditation / removal from Register of Training Providers [ROTD] (for apprenticeships)

The University has well established procedures and processes for the development, approval, management and monitoring of provision carrying professional accreditation / being on the ROTD.

In the event of any academic provision at the University losing professional accreditation / removal from ROTD, the University would consider measures such as:

- Offering students the opportunity to transfer to an alternative programme within the University;
- Supporting students to transfer to alternative providers which offer the accredited programme;
- (For apprenticeships) working with the Education and Skills Funding Agency and employers to support the transfer of learners to another approved training provider.

These measures would mitigate the impact on students and focus upon enabling them to complete their studies.

5) Subject closure

The University is currently not planning to close any subject areas. In the event of the University making the decision to close a subject area, the University would consider measures such as:

- Planned, incremental implementation of subject closure to allow all registered students to complete their studies;
- Supporting students to transfer to alternative providers.

These measures would mitigate the impact on students and focus upon enabling them to complete their studies.

6) Withdrawal of a Programme

Managed course changes are seen as a feature of a healthy, competitive and well-functioning higher education market. In line with sectoral practice, the University reviews its academic portfolio on a regular basis through established planning processes to ensure currency and attractiveness of its offer for students and stakeholders. Where this results in proposals for withdrawal of a programme, the University follows established [Programme Withdrawal Procedures](#) which consider impact on students.

The University is committed to the continuation of teaching (“teach out”) of any programmes which it has agreed to withdraw, to ensure that all registered students are able to complete their programme.

As the University is committed to the teach out of programmes, in the event that the risk occurs the overall risk to continuation of study would be minimal.

7) Inability to deliver material components of a course

The University considers resourcing requirements for programmes through Programme Initiation Processes and the annual planning round. For the majority of courses there is sufficient breadth across programme teams to mitigate the risk of an inability to deliver a material component of a course and in the case of postgraduate research, students are allocated to a supervisory team. However, there may be some programmes with specialist elements that rely upon niche subject expertise which is vested in a small number of individuals.

In the event of the University being unable to deliver a material component of a course, the University would consider measures such as:

- Securing suitable replacement staff resource;
- Considering alternative delivery arrangements, for example, moving or swapping module delivery to another semester;
- Considering whether the programme learning outcomes can be achieved through an appropriate replacement module(s) or other alternative means;
- Offering students the opportunity to transfer to an alternative programme within the University;

In the case of postgraduate research students, if a supervisor left the University, the University would consider measures such as:

- Identifying and appointing a suitably qualified replacement supervisor;

- Supporting the student in transferring to an alternative provider, where appropriate.

These measures would mitigate the impact on students and focus upon enabling them to complete their studies.

8) Reduction or removal of placement allocation by placement providers (which forms a compulsory element(s) of a programme)

The University considers placement requirements through the academic validation processes and thereafter via ongoing placement monitoring and placement management arrangements. The University has significant experience in managing placement activity and sourcing placement opportunities. The University works with an extensive range of placement providers across a range of discipline areas providing depth and a critical mass to its placement activity.

In the event of the University being unable to fulfil its duty to allocate a placement to a student, the University would consider measures such as:

- Considering alternative delivery arrangements, for example, moving or swapping placement delivery to another semester or year;
- Extending the geographical reach of placement settings and providers;
- Considering whether the programme learning outcomes and any professional body requirements can be achieved through an alternative practical learning experience or another type of placement;
- Offering students the opportunity to transfer to an alternative programme within the University;
- If none of the above are viable options, supporting students to transfer to alternative providers which offer the same or equivalent programme.

These measures would mitigate the impact on students and focus upon enabling them to complete their studies.

9) Withdrawal or Closure of Collaborative Provision

The University has in place formal agreements for its academic collaborative provision, at partner institution and programme level. Formal agreements set out responsibilities for teach out in the event of either party (the University or the partner) wishing to withdraw a programme. The agreements affirm both parties' commitments to complete the teaching of any programmes to be withdrawn to ensure that all registered students are able to complete their programme. Teach out would typically be delivered through the original delivery model (the partner delivering teach out under the oversight of the University). In the unlikely event of a collaborative partner being unable to fulfil its teach out duties to all registered students, the University would put in place arrangements to enable continuation of study.

These measures would mitigate the impact on students and focus upon enabling them to complete their studies.

Information on whether the provisions of the University or the Partner's Plan would apply if the Plan was to be invoked is set out in Appendix A.

3. Refunds and Compensation Policy

The University is committed to preserving the continuation of study for students and minimising significant disruption and/or disadvantage through implementing the measures set out in Section 2 of the Student Protection Plan.

Where the Student Protection Plan is invoked, the University will make every effort to manage the processes of negotiation and consideration of individual circumstances in ways which are transparent, reasonable, evidence-based and proportionate. The University's policy is to consider making refunds and paying compensation as determined to be appropriate for each individual situation.

The University recognises that there may be situations in which the measures we seek to take to preserve students' continuity of study may not be successful, it is in such situations that the Refunds and Compensation Policy and Procedure may be invoked.

Scope of Refunds and Compensation Policy

The sector definitions of refund and compensation have been adopted by the University:

A refund relates to the repayment of sums paid by a student to the University or an appropriate reduction in the amount of sums owed in future by the student to the University. This could include tuition fees, other course costs, or accommodation costs.

Compensation will relate to some other recognisable loss suffered by the student. This normally falls into two categories, either: (a) recompensing the student for out of pocket expenses they have incurred, which were paid to someone other than the University (such as travel costs) or (b) an amount to recompense for material disadvantage to the student arising from a failure by the University to discharge its duties appropriately.

Refunds and Compensation Procedure

The Refunds and Compensation Procedure sets out the process by which students may make an application and, in turn, how applications will be considered by the University. The Procedures provide detail of:

- timescales and deadlines;
- panel composition and operating arrangements;
- possible outcomes;
- evidence requirements – student and University; and
- how any payment of refunds or compensation will be managed.

The Procedure is available on the University website [here](#).

Notes:

- Students may not make a group application through the Refunds and Compensation Procedure as individual circumstances will differ, however the outcomes for students will be fair and agreed on a consistent basis;
- any student who has reached the end of the Refunds and Compensation Procedure and remains dissatisfied with the offer made may take their concerns through the Student Complaints process;

- this policy relates specifically to circumstances outlined in the Student Protection Plan. The University has separate Student Financial Regulations which detail the arrangements for refunds in the event of student withdrawal from their programme and similar circumstances;
- this policy does not compromise the right of any student to use the Student Complaints process.

Institutional Resourcing

The University believes that it has in place measures to effectively manage the events set out in its Student Protection Plan to ensure that students are able to continue their studies.

The University holds sufficient financial reserves to enable it to deal with the financial consequences of the majority of circumstances set out in the Student Protection Plan. Information on the University's financial position can be found in the Annual Report which is published on the University's website or available from Companies House.

4. Communicating our Student Protection Plan

The University will publish the Student Protection Plan on the University web pages (external facing) and in the Student Hub (internal facing) providing ease of access for current and future students and University staff.

The Plan will be proactively communicated as follows:

- At offer stage, a link to the Plan will be included in the offer letter, alongside other relevant terms and conditions;
- All new and returning students will have the Plan brought to their attention as part of online registration / re-registration, alongside relevant policies and procedures; and,
- The Plan will be brought to the attention of relevant staff through staff induction and training activities and will be referenced in our procedures and policies for course changes and closure

Arrangements to communicate with affected students should this plan need to be invoked

Note: The Plan will be deemed to be invoked if one of the scenarios in section 2 occurs and continuation of study cannot be guaranteed for all students.

Section 2 of this Plan sets out the University's commitment to preserving continuation of study for its students and also details the range of measures that the University would seek to implement to protect continuation of study. Should any scenario in the Student Protection Plan be invoked, early communication and consultation with affected students will be a high priority. The level and means of communication will be proportionate to the situation and could include individual notification to affected students, open briefings, cohort meetings and provision to engage remotely through online discussions. The Students' Union will also be notified.

The period of notice to affected students in some scenarios, if instigated, would be determined outwith the University (for example where employers withdraw placement provision, loss of UKVI status). In such instances, the University would communicate and consult with the students affected as soon as reasonably possible. In the case of programme withdrawals, the Programme Withdrawal Procedure sets out expectations of student consultation and communications with affected students. In all other instances affected students would be communicated and consulted with at the earliest opportunity.

Should any element of Section 2 of the Plan need to be invoked, the University will ensure that all students have access to:

- Independent confidential advice through the Students' Union or (for collaborative provision) other designated student representation body;
- appropriate advice on academic aspects from the programme team;
- advice on the implications for employment from the careers service; and
- support for students with disabilities and those with particular needs from Student Services.

Recourse to the University Complaints Procedure

In the event of a student being dissatisfied with the way in which the University implements its Student Protection Plan, a student may submit a complaint via the University's Student Complaints Procedure.

5. Review

The Student Protection Plan and the Refund and Compensation Policy are policies of the University Board.

The Plan and Policy will be reviewed on an annual basis by the Vice-Chancellor's Executive in consultation with the Students' Union prior to being recommended to the University Board for re-approval.

Appendix A: Information relating to whether a student should look to the provisions of the University's or Partner's Student Protection Plan

Associate Partner Name	Student Protection Plan (SPP)
Belfast Bible College	Partner is located outside England. The principles of the University's SPP would apply to all programmes it delivers in partnership with the University of Cumbria
Brathay Trust	The University's SPP would apply in relation to all programmes the Partner delivers in partnership with the University of Cumbria
Bury College	Partner's SPP would take priority in relation to all programmes it delivers in partnership with the University of Cumbria
Doncaster College (DN Colleges Group)	Partner's SPP would take priority in relation to all programmes it delivers in partnership with the University of Cumbria
FAME International College	Partner is located outside England. The principles of the University's SPP would apply to all programmes is delivers in partnership with the University of Cumbria
Furness College	Partner's SPP would take priority in relation to all programmes it delivers in partnership with the University of Cumbria, with the exception of BSc (Hons) Project Management. This is a sub-contractual arrangement and for this programme only, the University's SPP would apply
Gen2	The University's SPP would apply to all programmes it delivers in partnership with the University of Cumbria
Hugh Baird College	Partner's SPP would take priority in relation to all programmes it delivers in partnership with the University of Cumbria
Kendal College	Partner's SPP would take priority in relation to all programmes it delivers in partnership with the University of Cumbria
Lakes College	Partner's SPP would take priority in relation to all programmes it delivers in partnership with the University of Cumbria
Nelson and Colne College Group	Partner's SPP would take priority in relation to all programmes it delivers in partnership with the University of Cumbria
Sunderland College (trading as Sunderland College and Northumberland College)	Partner's SPP would take priority in relation to all programmes it delivers in partnership with the University of Cumbria

Robert Kennedy College	Partner is located outside England. The principles of the University's SPP would apply to all programmes it delivers in partnership with the University of Cumbria
Southport College	Partner's SPP would take priority in relation to all programmes it delivers in partnership with the University of Cumbria
School Direct Partnerships	The University's SPP would apply in relation to all programmes it delivers in these partnerships with the University of Cumbria
Vision College	Partner is located outside England. The principles of the University's SPP would apply to all programmes is delivers in partnership with the University of Cumbria