#### **Student Protection Plan**

Applicable from: 29 April 2025

Provider's name: Royal Holloway, University of London

Provider's UKPRN: 10005553

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#### What is the Student Protection Plan?

The plan sets out for students or applicants, what actions will be taken if a course, the campus, or the whole institution closes. The plan outlines: the University's assessment of the risk of these things happening; the measures it has in place to protect its students in the event that one of these risks occurs; and the possible impacts on the continuation of studies if certain events occur.

The University has a clear commitment to preserving the continuation of study for all students. Any issues that arise relating to this are brought to the attention of the Executive Board. If this plan needs to be triggered, then this document explains how we will support our students to continue or complete their studies or reimburse them if this is not possible. Any material changes to this plan are reviewed by Academic Board, Council (via the Audit, Risk and Compliance Committee) and the Students' Union, and then approved by the Office for Students. The plan is owned by the Executive Director Student Journey.

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

The following table shows an assessment of the risks to students being able to continue their studies with the University. The measures that are in place to mitigate each risk are explained, as well as the likelihood that the risks will crystallise and the severity of the impact on students if this were to happen.

Event	Assessment of risk and mitigations	Likelihood	Impact on students
Permanent closure of	The University is long established with a modest but stable	Very low	The closure of the University
the whole University	financial performance and is taking steps to secure its financial		would have a high impact on all
	sustainability as part of its new RH2030s strategy. The University		students if teaching out were not
	has sufficient cash reserves and a significant asset base. The		possible. The impact could be felt
	governing body of the University oversees the financial		more by groups who may find it
	performance and there is a comprehensive committee structure		harder to access alternative
	responsible for governance of financial planning, risk		providers such as disabled
	management and strategy. If the University was unable to		students or mature students
	continue operating, the provisions in this plan set out how		(who are more likely to be
	courses would be 'taught out' and, if this were not possible, to		carers).
	transfer students to other institutions, and provide exit awards or		
	offer refunds to those students who would prefer this.		
Temporary shutdown	Routine maintenance and development of buildings and	Low to	A sudden and unplanned
of the whole, or part	facilities, which may result in temporary closure or permanent	medium	shutdown could result in some
of the campus	replacement, is not covered by this plan. Such work will be	(to reflect	short-term disruption for
	carried out in a way that ensures students can continue their	cyber	students whilst alternative
	studies. In the event of a natural disaster, pandemic or an	threat)	facilities are set up (1-2 days),
	incident such as a major fire, which resulted in the unavailability		however the overall impact on
	of specialist space or resources, the business continuity plan		continuation of studies would be
	would be implemented to secure alternative facilities in the local		low. Such arrangements would
	area, resulting in a low risk to the continuation of students'		need to take into account the
	studies. This includes the risk of a cyber-attack, where the impact		different needs of students, such
			as accessibility requirements and

	might be more prolonged as evidenced by recent events across the sector.		ability to travel to an alternative location. A cyber incident may take considerably longer to work through, certainly in terms of weeks and potentially months dependent on which systems were impacted.
Permanent closure of a campus location	The University's central London provision continues to be provide teaching space for a variety of courses. Should the University deem it necessary to close the central London campus, it would teach out those students, endeavour to find a suitable venue in London for courses to be delivered, or move delivery to the Egham campus. For courses currently delivered on the Egham campus, the University would strive in the first instance to teach out the course, and has approved processes in place for course closure, withdrawal or suspension as indicated below.	Low	Permanent closure of a central London location would have a high impact on students who are unable to travel to Egham. Closure of the Egham campus would inevitably have a high impact on all students especially those who may find it harder to access alternative providers.
The University is no longer able to award the qualifications for which its students are registered because the Office for Students has varied or revoked its degree awarding powers	Royal Holloway delivers degree courses which lead to awards of the University of London, and degree courses, diplomas and certificates that lead to awards of Royal Holloway and Bedford New College. The risk that the University loses its degree awarding powers and is unable to award Royal Holloway and Bedford New College qualifications is considered very low as the University regularly monitors its compliance with the regulatory requirements of the Office for Students. If this were to happen, we would seek a validating agreement with another provider to enable students to be awarded their degrees.	Very low	The impact on students would be low as a validating agreement would enable them to receive a degree on completion of their studies on site.
University of London closure	The risk that the University would no longer be able to award University of London awards is very low. If this were to happen, the University would be able to use its own degree awarding powers for taught and research degrees to award Royal Holloway	Very low	The impact on students would be low as the University would still be able to award a degree when they complete their studies.

	and Bedford New College degrees to students who would have		
	been eligible for a Royal Holloway, University of London award. If		
	University of London shared services were no longer available,		
	then we would seek alternative equitable provision for students.		
Closure of one or	In the rare instance that a department or subject area is required	Low to	A planned subject or department
more subject areas	to close in an unplanned and sudden way, the University would	medium	closure should have a low impact
and/or departments	teach out the course. If teaching out is not possible, other	(to reflect	on current students. Students
	measures in this plan would apply (transfer to another course or	cyber	who have interrupted their
	provider, provision of an exit award, or refunds as appropriate).	threat)	studies or are part-time could be
	There is a linked threat from a cyber-attack, which might		affected to a greater extent if
	compromise student access to course or teaching materials		they are not able to complete
	hosted on our Virtual Learning Environment (VLE). The relevant		within the teaching out
	business continuity plan, which includes scenarios for a cyber		timeframe. A cyber incident may
	incident, would be implemented to prioritise recovery of key		disrupt planned modes of
	systems for students, whilst alternative provision would be		teaching for weeks and
	explored.		potentially months dependent on
			which systems were impacted.
The University is no	While the initial course approval process ensures that new or	Low	A course closure would have a
longer able to deliver	revised courses have sufficient resource to deliver them, the		low impact on most enrolled
one or more courses	University regularly reviews its course portfolio and may close		students given the policy in place
to students	courses that no longer meet market demands or are not viable		for managing this event.
	due to operational reasons. Although there is a possibility that		Students who have interrupted
	we may close courses in these circumstances, the University has		their studies or are part-time
	approved processes in place to manage course closure as		could be affected to a greater
	detailed in our <u>Course Closure and Suspension Policy</u> . We would		extent if they are not able to
	teach out the course over a number of years to afford currently		complete within the teaching out
	enrolled students (including repeating and resitting students),		timeframe.
	and those on interruption, the opportunity to complete their		
	course of study. The likelihood that we would be unable to deliver		
	a course to a current cohort of student is therefore low. Where		
	teaching out is not possible, other measures in this plan would		

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	apply (transfer to another course or provider, provision of an exit		
	award or refunds as appropriate).		
The University is no longer able to deliver material components of one or more courses	Changes to material components are considered as part of ongoing course review and development, and the University may make reasonable changes to courses in order to deliver a better quality of educational experience to students, or are required to update courses in keeping with professional, statutory and regulatory body (PSRB) requirements or updates to ensure graduates have entry to practice their chosen profession. In making any changes, the University will aim to keep the changes to the minimum necessary and will notify and consult with affected students in advance about any changes that are required. As outlined in the University's <u>Admissions Terms and Conditions</u> , if the University changes a course and students are not satisfied with the changes, they will be offered the opportunity to withdraw from the course, move to another course or, if required, offered reasonable support to transfer to another provider.	Low to medium (to reflect cyber threat)	Planned changes will normally have a positive impact on students as they are intended to provide a better educational experience. Changes due to events outside of the University's control may have a greater impact on students depending on the nature of the change.  A cyber incident may disrupt planned modes of teaching for weeks and potentially months dependent on which systems were impacted.
	Changes to courses may also happen for reasons outside of the University's control and the University will take all reasonable steps to minimise disruption including those listed above. If students are not satisfied with steps to mitigate this disruption, they may terminate their contract with the University and we will follow our policy on refunds and compensation. Alternatively, students may make a complaint under the Student Complaints Procedure.  Regarding accreditation with professional, statutory and regulatory bodies, the University has agreed processes in place to		

	minimise the risk of losing accreditation and this risk of this occurring is therefore low.  Changes to courses due to key specialist staff or postgraduate research supervisors leaving the University is low because the University's course approval process ensures that new or revised courses have sufficient resource to deliver them. The University's policy for research degrees is that all students will have access to a main supervisor and at least one other academic. Should a research degree student hold an offer to study with a named supervisor and the named supervisor is no longer available to supervise them, a suitable alternative supervisor will normally be offered. If the research degree student did not wish to accept this change, they are entitled to withdraw your application as outlined in the Admissions Terms and Conditions.  There is a linked threat from a cyber-attack, which might compromise student access to course or teaching materials hosted on our Virtual Learning Environment (VLE). The relevant business continuity plan, which includes scenarios for a cyber incident, would be implemented to prioritise recovery of key systems for students, whilst alternative provision would be		
Industrial action	In recent years, the higher education sector has experienced disputes which have led to industrial action and the likelihood of further action is very high. However, the University is committed to effective working relationships with trade unions and aims to minimise impact on studies in the event of industrial action by its staff.	Very high	Given the contingency plans in place, the impact on students being able to continue their studies would be low to medium.

The University has a robust contingency plan which can be put in place to mitigate against the risk of disruption to study due to industrial action. The plan aims to minimise the impact of industrial action on students with the expectation that, on working days, activities continue to be delivered that enable students to meet the learning outcomes of their course. During any strike action, the University will monitor closely which classes take place so that the impact of the action on courses and assessment is understood.

Support services should continue to operate during any strike periods. While some student-facing library support services, including scheduled classes, may be disrupted by industrial action, there is a range of online study guides available as an alternative for obtaining immediate advice and information. If required, the University may also use alternative third party arrangements to maintain safe student access to study space in the library. The Student Services Centre should continue to operate during any strike periods with staff from across Student and Schools Administration being drafted to cover any absences and maintain usual opening hours in the Centre during the period of action. Impact mitigation for academic skills activity would include reviewing requirements and prioritisation of ongoing academic skills support for all taught students, including 1:1 tutorials, drop-ins and workshops. Although services may need to be temporarily adjusted or reduced, activities would continue to be delivered both online and in-person, addressing key aspects of academic writing and communication, maths, stats, numeracy, and studying independently.

	Health and wellbeing services will continue to operate during any period of industrial action. Services would adapt their operation and support options to respond to student need under the circumstances. This would include interventions to support students with issues that may arise from the action / strike such as additional stress and anxiety. The teams provide access to online support resources, and access to an externally manged mental health platform that could assist should staffing levels be reduced. Staffing priorities would be amended to ensure direct student support, through 1-2-1 session, group work or workshops, was the core operational function, and amended based on staffing levels. Should staffing levels require an adjustment to business as usual operations, all student facing activity and engagement would continue to be delivered both online and in-person with need for 1-2-1 engagement assessed on a case by case basis including an assessment of risk to the student. The University teams would also seek to identify opportunities to engage more closely with external support networks and review if additional caseworker or adviser support could be brought in on a temporary basis.  If industrial action resulted in students being unable to continue their studies, the University would follow the measures outlined above for events outside of its control.		
Closure of collaborative partnerships	A robust due diligence process is followed before setting up collaborative agreements, they are carefully monitored annually and appropriate contractual mechanisms in place in the event of failure. Should the University close, we would support students at collaborative organisations (where Royal Holloway is the awarding body) in the same way as the main student cohort. The risk is low, however in the unlikely event that a collaboration	Low	The impact of closure on students may be higher for collaborations based outside the UK as it may be harder to find alternative study options if our agreement with a partner ends.

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	were to collapse, where Royal Holloway is the awarding body the		
	University would strive in the first instance to teach out your		
	course. As noted above, there are approved processes in place for		
	the University to discuss such closures with students: Policy for		
	Course Closure and Suspension.		
	In the unlikely event that the International Study Centre		
	Agreement with Study Group Limited is terminated, Study Group		
	will follow its own student protection procedures to teach out		
	existing students. The University will honour any offers of places		
	on University courses as at the date of termination (subject to		
	students meeting the conditions of their respective offers and		
	the progression criteria) and will honour any remaining		
	obligations to students already enrolled on courses at the		
	International Study Centre via Study Group.		
Closure of one or	The majority of the University's courses are taught in attendance	Low to	If the University were to change
more modes of study	and it is unlikely that it would be unable to deliver this mode of	medium	mode of study, it would
	study. However, the University's response to the cessation of in	(to reflect	endeavour to minimise the
	person teaching during Covid-19 pandemic demonstrates an	cyber risk)	impact on students by providing
	ability to continue to deliver courses in a scenario when students		the same quality of provision and
	are not able to attend campus, and the University's mode of		supporting students with
	curriculum delivery is kept under constant review as part of the		different learning needs. The
	new RH2030s strategy. The University also provide some distance		impact on most students would
	learning in partnership with the University of London Worldwide		therefore be low.
	which is covered by the <u>University of London's student protection</u>		
	plan.		A cyber incident either to Royal
			Holloway or the University of
	Given the online mode of delivery for University of London		London may disrupt planned
	Worldwide, there is a linked threat from a cyber-attack, which		modes of teaching for weeks and
	might compromise student access to course or teaching		potentially months dependent on
	materials hosted on our Virtual Learning Environment (VLE). The		which systems were impacted.

	relevant business continuity plan, which includes scenarios for a cyber incident, would be implemented to prioritise recovery of key systems for students, whilst alternative provision would be explored.  Most of the University's courses are taught on a full-time basis although some part-time courses are offered. It is highly unlikely that the University would be unable to offer these modes of study. If this were the case, then the University would follow the Course Closure and Suspension Policy.		
We are no longer able to recruit or teach international students	The University is a UK Visas and Immigration (UKVI) Sponsor Licence holder with Student Sponsor status, allowing it to sponsor international students to study in the UK. The University has a strong track record, having had Student (previously Tier 4) Sponsor status since Tier 4 (now Student Route) of the points-based system was introduced in 2008. The University has robust monitoring processes in place to continue to meet stipulated requirements and also has an A rating for the Skilled Worker Visa and Temporary Work Visa of the Sponsor Licence.	Low	The impact on international students in this scenario could be high, although we would work with UKVI to address any impact on current students' immigration status and study.
	In the event that UKVI warned that they may suspend the University's licence, the University would work with them to address concerns and minimise the risk of this happening. In the event the UKVI took action to revoke the University's sponsor licence, the University would work with them to address any impact on current students' immigration status and study.		

The University also recognises that, should any of these risks materialise, they may not only impact on continuing students, but also applicants who have accepted a firm offer of a place and who are committed to studying at the University. The University would be committed to offer these applicants a place on an alternative course at the University where possible.

## 2. The measures that the University has put in place to mitigate those risks that it considers to be reasonably likely to crystallise

The University has set out below more information to help students understand the measures that the University has put in place to mitigate the risks that are considered to be reasonably likely to crystallise and how the University will make sure that measures are fair and reasonable.

The University is committed to ensuring that students are treated fairly with dignity and respect. The University recognises that students may have different needs based on their protected characteristics or other circumstances, and the University will work with students on a case-by-case basis where these measures may not be suitable or requirement adjustment.

Procedure	Description	How we will ensure measures are fair and reasonable
Teaching out	As indicated in the risk section above, if a campus, course, or department had to be closed or a collaboration ceased, the University would strive in the first instance to 'teach out' the course to ensure that students are able to complete their degree at the University.	Issues of 'pathways' of study, such as a foundation year that leads to a main degree or moving from undergraduate to masters level in a particular discipline, would be carefully considered during the implementation of the policy for course closure and suspension. The University would take into consideration options for students who have interrupted their studies and part-time students.
Transfer to another course or provider	If for any reason it was not possible to 'teach out' then the University would assist students to transfer to a related alternative course within the University, or if appropriate, to another institution. If students left the University to transfer to another institution, the University would provide a transcript of the modules that students had passed as evidence of their learning at the University.	In the unlikely event that you were transferred to alternative provider, consideration would be given to ensure the alternative course was 'comparable', in terms of graduate prospects and student satisfaction levels.
Teaching and assessment contingency	The University has contingency arrangements in place to address disruption to teaching or assessment. For example, teaching and assessment can now be delivered using methods such as (but not limited to) online delivery, recording of lectures, provision of	

	independent learning materials and modification of assessment methods, ensuring that academic	
	standards are met. This also	
	extends to student and academic	
	services.	
Exit awards	If students were unable to	
and records	complete their studies, the	
	University would provide a	
	transcript of the modules they had	
	passed and an intermediate exit	
	award if they had sufficient credits.	
Refunds and	The University has set out below	The University will determine
compensation	more information about its policy	refunds and compensation on a
	on refunds and compensation.	case-by-case basis, taking into
		account the specific
		circumstances.

The plan would not be triggered for events that are covered by established processes, such as the University's business continuity plan and teaching and assessment contingencies. Minor adjustments and improvements to course and module content are part of the University's usual quality processes and would not cause the plan to be triggered. The plan would also not be triggered for circumstances affecting individual students or for planned work on buildings or facilities.

3. Information about the policy the University has in place to refund tuition fees and other relevant costs to its students and to provide compensation where necessary in the event that the University is no longer able to preserve continuation of study

In the unlikely event the University closes a course and/or moves teaching to an alternative campus or institution, the University will consider reimbursing impacted students. This will be determined on a case-by-case basis and will depend on the circumstances and in line with any mitigation offerings which will allow the student to complete their period of study.

The University's policy on refunds and compensation is encapsulated in the University's Student Fee Regulations which are available on its <u>student intranet</u>.

The University has cash reserves of £79 million, at 31 July 2024, along with liquid investments of over £30m that could be drawn down if needed, which would be sufficient to provide refunds and compensation for students in all foreseeable circumstances.

Re-imbursement may be given in relation to the following:

 Additional travel/relocation costs to enable completion at an alternative University campus.

- Additional travel/relocation costs to enable a student to transfer to complete at an alternative institution.
- Maintenance costs if a student is required to lengthen their period of study to enable them to complete the course.
- Continuation of an expected bursary for the remainder of the academic year.

If this occurs you will be advised of the re-imbursements claim process, and your refund will be processed in line with the <u>Admissions policy</u>.

### 4. Information about how the University will communicate with students about its Student Protection Plan

#### Student involvement in creating and updating the plan

The current Student Protection Plan has been drawn up in collaboration with the University's Students' Union. The University's Executive Board meets regularly with the key members of the Students' Union to discuss matters such as those covered in this protection plan and how students' interests might be protected in the event of a risk materialising.

Any material changes to the plan will be reviewed by the Academic Board and Council (via the Audit, Risk and Compliance Committee), as the governing body of the University, both of which include student representation.

#### How can students access the plan?

The plan will be publicised to current and future students by posting a link on the relevant sections of the <u>Admissions</u> page and <u>student intranet</u>.

#### How are students involved if a course needs to close?

The University has in place a <u>Course Closure and Suspension Policy</u>. As outlined in the policy, student consultation is a part of this process, and the relevant academic staff will meet with students enrolled on any affected course and representatives from the Students' Union to discuss the implications of the proposed closure and will endeavour to teach out the course to minimise the impact on students. There may, however, be cases where departments wish to withdraw courses after they have been advertised and offers made. To minimise the impact on students, the University has agreed strict deadlines in terms of making and communicating decisions about course closures/ withdrawals and suspensions before students commence their studies. This is to ensure that undergraduate students can amend their final choice of course and to allow postgraduate students sufficient time to explore alternative study opportunities at the University or at other institutions.

#### Student support

In the unlikely event that the any of the measures in the Student Protection Plan need to be implemented, the University will ensure that students have ready access to the full range of services provided by the Student Services Centre, and internal support, health, and wellbeing services, bringing in additional resources in times of increased demand. The University will also make sure that students are aware of the support they can receive from

the Students' Union, including the Advice Centre, and of how they can make a complaint if necessary. This information is readily available on the <u>student intranet</u>.

### Ensuring good communication

The University ensures that staff are made aware of the implications of the Student Protection Plan when they propose course closures and about their responsibilities in terms of consultation with students through the course closure process.