Student Protection Plan for the period 2022/23

Provider's name: Royal Holloway, University of London
Provider's UKPRN: 10005553
Legal address: Royal Holloway, University of London, Egham, Surrey, TW20 0EX.
Contact point for enquiries about this student protection plan: Jon Howden-Evans, Director of Student Academic Services

What is the Student Protection Plan?

The plan tells you, as a student or applicant, what actions will be taken if a course, the campus or the whole institution closes. The plan outlines our assessment of the risk of these things happening and the measures we have in place to protect you as our students in the event one of these risks actually takes place and impacts on the continuation of your studies. Royal Holloway 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 you to continue or complete your studies or compensate you if this was not possible. This Student Protection Plan is reviewed annually by the Executive Board, Council (the College’s governing body), and the Students Union.

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

Royal Holloway, University of London, delivers degree courses which lead to awards of the University of London and also degree courses, diplomas and certificates that lead to awards of Royal Holloway and Bedford New College. The College is a UKVI Sponsor Licence holder (Tier 2, Student {previously Tier 4} and Tier 5) with Student Sponsor status allowing the College to sponsor international students to study in the UK.

The key risks to the College’s ability to deliver courses are as follows:
- Permanent closure of the whole College
- Temporary shutdown of the whole, or part of the College as a result of pandemic or natural disaster
- Significant failure to recruit students, leading to course, department, Campus (central London) or College closure
- Loss of UKVI Sponsor Licence
- Closure of collaborative partners
- University of London closure
- Changes to material components of courses of study
- Industrial action

The College 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 College. The College would be committed to offer these applicants a place on an alternative course at the College.

Permanent closure of the whole college
The risk that the College as a whole will not be able to deliver courses, or will be unable to operate, is very low. The College is long established and financial performance has been consistently strong over recent years. The College has healthy cash reserves and a significant asset base. The governing body of the College oversee the financial performance and there is a comprehensive Committee structure responsible for governance of financial planning, risk management and strategy.
Temporary shutdown of the whole, or part of the campus as a result of pandemic or natural disaster
The risk of being unable to use some or all of the campus has, in recent years, been higher than usual due to the Covid-19 pandemic. The College has business continuity plans across all departments to deal with this so the College can continue to operate effectively and deliver services to students throughout any periods of shutdown. Academic Services (such as the Centre for the Development of Academic Skills (CeDAS) and Student Support Services (such as Disability and Neurodiversity Service, Wellbeing, Student Advisory Service, International Student Support Office and Careers Service) have continuity plans which enable a move to remote, digital services. The IT department has a robust continuity plan to support remote working of staff and students.

In the event of a natural disaster or an incident such as a major fire, which resulted in the unavailability of specialist space or resources, the business continuity plan would be implemented to secure alternative facilities in the local area.

Significant failure to recruit students
Due to the ongoing impacts of the unprecedented global pandemic, there is an increased risk that in the short to medium term the College will fail to meet recruitment targets which will impact on financial return. However, the College carefully manages its recruitment and has a robust recovery plan in place in response to the pandemic. The recovery plan documents recovery options and senior staff are identified as responsible for the implementation of the continuity arrangements.
Should the College deem it necessary to close the central London campus it would either endeavour to find a suitable venue in London for the courses to be delivered or move delivery to the Egham campus. For courses currently delivered on the Egham campus, the College would strive in the first instance to teach out the course and already has in place approved processes for course closure, withdrawal or suspension which include discussing such closures with students: https://intranet.royalholloway.ac.uk/staff/assets/docs/pdf/aqpo/2019/policy-for-course-closure-and-suspension.pdf

Loss of UKVI Sponsor Licence
The College has had Student (previously Tier 4) Sponsor status since Tier 4 (now Student Route) of the points-based system was introduced in 2008 and has robust monitoring processes in place to continue to meet stipulated requirements. The College has an A rating for the Tier 2 and Tier 5 of the Sponsor Licence. Given the College’s track record, the risk of losing the UKVI Sponsor Licence is very low.

Closure of collaborative partners
Relative to other HEIs, the College currently has relatively few collaborations with providers for franchised and validated courses both in the UK and overseas. The College’s Register of Collaborative Provision provides details of all partners and types of partnerships. A robust due diligence process is followed before setting up such agreements, they are carefully monitored annually and delay or failure of the arrangement due to Force Majeure is covered in each legal contract. Should the College 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 were to collapse, where Royal Holloway is the awarding body the College would strive in the first instance to teach out the course and already has in place an approved process for the College to discuss such closures with students: https://intranet.royalholloway.ac.uk/staff/assets/docs/pdf/aqpo/2019/policy-for-course-closure-and-suspension.pdf
In the unlikely event that the progression agreement with Study Group has to be terminated, then the College will honour any offers of places on College courses as at the date of termination (subject to

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In the unlikely event that the progression agreement with Study Group has to be terminated, then the College will honour any offers of places on College courses as at the date of termination (subject to
students meeting the conditions of their respective offers) and will honour any remaining obligations to students already enrolled on courses via Study Group.

**University of London closure**
The risk that the College would no longer be able to award University of London awards is minimal. If this were to happen the College would be able to use its own degree awarding powers for taught and research degrees to award Royal Holloway 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.

**Changes to material components of courses of study**
The risk that the College would be unable to deliver material components of courses due to key specialist staff or postgraduate research (PhD) supervisors leaving, for example, is low since changes to material components are considered as part of ongoing course review and development. The initial course approval process ensures that new or revised courses have sufficient resource to deliver them.

**Industrial action**
The College is committed to effective working relationships with trade unions and aims to minimise impact on students in the event of industrial action by its staff. The College has a robust contingency plan which can be put in place to mitigate against the risk of disruption to students’ study. 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 College will monitor closely which classes take place so that the impact of the action on courses is understood. Support services such as the Library, Student Services Centre and CeDAS should continue to operate during any strike periods. The College offers reassurance to students that they will not be disadvantaged in their assessment or exam outcomes as a direct result of industrial action.
2. The measures that the College has put in place to mitigate those risks that we consider to be reasonably likely to crystallise

A key risk over the past few years has been temporary closure to the College campus due to the Covid-19 pandemic. As such, the College has developed business continuity plans and is able to provide alternative methods of delivering courses and assessment. All 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. The College has appointed a Principle External Examiner who gives oversight of the whole assessment process. There is investment in online delivery and in the pedagogy of teaching staff to advance remote methods of teaching. All of our Student & Academic Services are capable of being provided remotely: Student Administration, Wellbeing, Academic Skills, Library and Careers continue to provide the services online to meet the needs of students, via Microsoft Teams and email. Clinical Mental Health and specialist support, Disability and Neurodiversity Service and Counselling can continue to be offered remotely for 1 to 1 advice and support. Work continues to increase resources available from Library Services.

The College has a number of ‘opportunities’ (placements and study abroad) that are part of degree schemes, contributing to the overall classification of those degrees. Most of these are in the UK, with some internationally hosted opportunities. There is a policy in place to mitigate against disruption to placements and study abroad. Government and public health requirements and guidance will always be followed to support the welfare of the student. Opportunities may be altered so the student works/studies remotely where this is possible/safe to do so. Where this outcome cannot be achieved, the opportunity will be paused. The College will ensure that all students are supported travelling/returning home and that academic performance is not adversely affected. In the case of a placement that counts towards/ is necessary for a professional/ public body accreditation, representations will be made to relevant body/ bodies to support the student in achieving the relevant recognised status.

As indicated in the risk section above, in the event that student recruitment fell to the extent that courses and/ or individual departments had to be closed or a collaboration collapsed, the College would strive in the first instance to ‘teach out’ the courses to ensure that students are able to complete the degree courses that they applied to at the College. 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 which students might see as a continuation of studying would be carefully considered during the implementation of the policy for course closure and suspension. If for any reason it was not possible to ‘teach out’ then the College would assist individual students to transfer to a related alternative course within the College, or if appropriate, to another institution. In the unlikely event that individual students were transferred to alternative providers then consideration would be given to ensure the alternative course was ‘comparable’, in terms of graduate prospects and student satisfaction levels.
3. Information about the policy the College has 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

The College’s policy on refunds and compensation is encapsulated in the College’s Student Fee Regulations.

The current version of this document is available at: https://intranet.royalholloway.ac.uk/students/assets/docs/pdf/student-fees-regulations-2022-23.pdf

The Regulations have been reviewed for 2022-23 and the revised ‘Refund of Fees’ section is provided below. The College has cash reserves of £77 million, at 31 July 2021, which would be sufficient to provide refunds and compensation for students in all foreseeable circumstances.

Refund of Fees
55. Applicant tuition deposits will only be refunded in line with the College’s Admissions policy and procedures. View the policy here.
56. Fee refunds occurring following withdrawal or interruption of study or for any other reason will only be actioned once the appropriate form has been completed by the student and department and processed into the student records system by Student Administration.
57. Refunds will be made to the original payer (this includes sponsors) and via the original method of payment. Refunds will not be issued in cash or by cheque. Any payments originating from these methods will be refunded by direct bank transfer. Any payments originating from the Student Loans Company will be reimbursed directly to the SLC.
58. Overpayments of fees will, in all cases, be offset against future due invoices held on the student’s fee account before any refund will be considered.
59. Students may be asked for documentary evidence or confirmation of bank/payment card details to support a refund request. All refund requests should be made by email to the Student Fees Office. The Student Fees Office aim to process all refund requests between 5-15 working days.
60. If tuition fees paid initially by the student are subsequently paid in full (as cleared funds) by another person or body, the refund will normally be made to the student.
61. Any refund arising from a US Federal Loan will be administered in accordance within the US Department of Education or loan provider guidelines. View the guideline here.
62. At certain times, the Student Fees Office may initiate refunds on accounts where no further invoices fall due. Email notification will be sent to the student's Royal Holloway email address following the refund.
63. Royal Holloway reserves the right to offset overpayments on the student account against invoices due in the subsequent academic year.

Financial Effect of Course Closure

Where the College closes a course and moves students to an alternative campus or institution the College will consider reimbursing 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 students to complete their period of study.

Re-imbursement may be given in relation to the following:
- Additional travel/relocation costs to enable completion at an alternative College campus.
- Additional travel/relocation costs to enable a student to transfer to complete at an alternative institution
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- 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

In the cases of a Course Closure students will be advised of the re-imbursements claim process.
4. Information about how the College will communicate with students about our student protection plan

Student involvement in creating and updating the plan
The current Student Protection Plan has been drawn up in collaboration with the College’s Students’ Union. The College’s Executive team 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.

Going forward the plan will be reviewed annually by the Academic Board and Council (via the Council Students, Education and Research Committee), as the governing body of the College, 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 College website as follows:
- Admissions page: https://www.royalholloway.ac.uk/studying-here/applying/admissions-policy-and-procedures/
- Student Intranet: https://intranet.royalholloway.ac.uk/students/study/our-college-regulations/our-college-regulations.aspx

How are students involved if a course needs to close?
The College has in place a Policy for Course Closure and Suspension: https://intranet.royalholloway.ac.uk/staff/assets/docs/pdf/aqpo/2019/policy-for-course-closure-and-suspension.pdf

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 to discuss the implications of the proposed closure with them and will endeavour to teach out the course to minimize the impact on registered students. There may, however, be cases where departments wish to withdraw courses after they have been advertised and offers made. To minimize the impact on students the College 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 have the opportunity to amend their final choice of course and to allow postgraduate students sufficient time to explore alternative study opportunities at the College 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 College will ensure that students have ready access to the full range of services provided by the Student Services Centre, and internal support, health and welfare services, bringing in additional resources in times of increased demand. The College will also make sure that students are aware of the support they can receive from the Students’ Union, including the Advice Centre. This information is readily available on the College website (https://www.royalholloway.ac.uk/students/help-support/help-and-support.aspx).

Ensuring good communication
The College will ensure, going forward, 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.