

Student Protection Plan

Provider's name: University of Bradford

Provider's UKPRN: 10007785

Legal address: Richmond Road, Bradford BD7 1DP

Contact point for enquiries about this document: Academic Registrar, (academicregistrar@bradford.ac.uk)

Student Protection Plan for the period 2024/25

This paper sets out the University of Bradford's Student Protection Plan which demonstrates how we protect students should a risk to the continuity of their studies arise. At the University of Bradford, we place students at the centre of our business and endeavours and therefore we give the highest priority to the protection of our students. The types of event or changes which might cause a risk to the continuation of studies are detailed below.

The plan sets out our assessment of the risks to continuity of study and the steps we will take to mitigate these risks. As an established provider of Higher Education, we have significant experience of effectively managing our programmes and ensuring a high-quality student experience. We have drawn upon this experience in developing our Student Protection Plan.

This plan forms part of our Student Contract and is available to all current and potential students. The plan details measures that are in addition to the protections students have under consumer protection law. It is important to note that year on year minor adjustments and improvements to programmes and modules will not trigger the implementation of this Student Protection Plan. These changes are made to enhance the delivery of our programmes.

Overall, we are confident that we can assure the continuity of study for our students.

The relevant actions of our Student Protection Plan would be triggered if the risks described actually materialised. Our risk management systems and approach will, excepting extreme unexpected scenarios, allow us to monitor, mitigate and respond to potential events in a measured way, to ensure the interests of our students remain protected.

Our assessment of our risks

As detailed below we have assessed the risks to continuity of study in terms of the likelihood of the risk being realised and the impact the risk would have if it did materialise:

Likelihood

We have classified the risks to continuity of study for students on a scale as follows:

- Very unlikely – a risk would only occur in very unusual or exceptional circumstances;
- Unlikely – a risk could occur but we do not anticipate this;
- Possible – there is some likelihood of a risk occurring;
- Likely – there is a realistic possibility of a risk occurring;
- Very Likely – there is a very strong possibility of a risk occurring;
- Definite – we already know that a risk will occur.

Impact

We have classified the impact that a risk would have on students as follows:

- Insignificant – the impact is such that it can be mitigated through existing processes and procedures through business as usual;
- Minor – we would need to make some specific adjustments to mitigate impact, however this could be managed at Faculty-level, and would not require significant resource (temporal, fiscal or human);
- Moderate – we would need to make adjustments to mitigate impact, requiring some resource, and we would ensure institutional oversight of work undertaken;
- Major – mitigation would require the involvement of our Executive Board, and may require significant resource investment;
- Extreme – mitigation would require involvement of our Council and Senate, and may require external support and resource.

Our risks to continuity of study for students are as follows:

Risk: loss of degree awarding powers or University status

Likelihood: Very Unlikely

Impact: Extreme

We have appropriate checks and balances in place, through our governance and management structures, to ensure that we meet our regulatory requirements. The University's Council takes active oversight of the effective governance of the University, reviewing annual accountability returns which provide assurance on the performance of the University. The University's Teaching Excellence Framework (TEF) Silver Award was reconfirmed in October 2023 with Silver awards for Student experience and Student outcomes meaning it is delivering high quality education and positive outcomes. In reaching their decision, the TEF panel found "compelling evidence ... there are both very high quality and outstanding features which apply to all the provider's groups of students, including students from underrepresented groups", noting that this is "consistent with the institution's goals as an engine for social mobility."

Risk: institutional closure due to financial performance or loss of resources

Likelihood: Unlikely

Impact: Extreme

Our cash reserves enable us to manage year-to-year variations in income. Although the University has been in a position where it has reported surpluses in recent years, the financial impact of lower numbers of international students across the sector has also affected the University. The University's Growth and Financial Sustainability Plan, signed off by our Council, is intended to bring our position back into a more comfortable position over the next five years.

Our cash reserves and further long-term investments means that in the unlikely event that we needed to cease trading we could take a phased approach to closure, enabling us to work with other local providers to ensure that students are provided with opportunities to complete their studies.

We have institution-wide contingency plans in place through our business continuity planning for our estate and infrastructure to ensure that we can continue to operate in the event of a crisis event.

Risk: closure of part of our campus (Mid-Yorkshire Hospitals Campus)

Likelihood: Very Unlikely

Impact: Moderate

Our partnership with Mid-Yorkshire Hospitals NHS Trust is relatively new and to support this partnership we have a teaching site at Dewsbury Hospital developed specifically to support the workforce needs of the NHS in this region. We foresee the development continuing in the long term and have no plans to close the site. In the unlikely event of this campus closing, we would relocate the programme which operates at Mid- Yorkshire Hospital to another suitable site to ensure that all students could complete their studies.

Risk: closure of part of our campus (Main Campus)

Likelihood: Likely

Impact: Minor

The University's Infrastructure Directorate undertakes detective and preventative activity to ensure that the Campus is fit for purpose but there is the possibility that a building or part of a building may become unusable. We would relocate classes and other sessions to another suitable location on campus to ensure that all students would be able to complete their studies.

Where specific facilities required for a particular programme are unable to be accessed, timetabling changes will be made to ensure that students are able to access these facilities later in the programme. Where the campus closure is for a protracted period of time, suitable alternative arrangements will be put in place.

Risk: closure of subject area

Likelihood: Possible

Impact: Moderate

The University sets an overall strategy and mission on a five-year basis and reviews its subject and programme portfolio in line with this. We monitor subject areas closely in terms of quality of delivery and financial sustainability. Should a decision to close subject areas be taken, the impact on individual students would be mitigated through our usual arrangements to teach-out all existing programmes, ensuring that students can complete their degrees. There is no planned significant change to our overall subject portfolio for 2024/25.

Risk: closure of a programme of study

Likelihood: Likely

Impact: Minor

We regularly review our provision to ensure its currency and relevance, and we do often make changes to keep provision up to date. This sometimes includes closing a programme. We do this to ensure that our students have access to cutting-edge programmes, that we provide programmes in line with student demand and industry need and that our programmes are sustainable. We believe that this is beneficial to students as it ensures that we only offer programmes which are current and relevant and which can deliver a high-quality student experience. However, when we decide to close a programme, we always ensure that we continue to deliver a programme until all current students have completed their studies.

Risk: loss of Professional, Statutory and Regulatory Body accreditation

Likelihood: Unlikely

Impact: Major

We have a strong track record in delivering high quality, professional and vocational programmes, and work closely with our Professional, Statutory and Regulatory Bodies (PSRBs) to ensure that our provision remains in line with their requirements. Around 85% of our programmes enjoy PSRB accreditation and we have a strong history of success in renewing our accreditations over a period of many years. Our staff have strong links with their PSRBs and are in regular contact with the relevant bodies to ensure we are attuned to changes in requirements and modify our provision to maintain compliance.

In the unlikely event of a programme not being accredited by a Professional, Statutory and Regulatory Bodies or a body proposing to withdraw accreditation, the University would work with the body to identify what measures needed to be put in place for the accreditation to continue. In the event that, despite these efforts, accreditation was withdrawn and where that programme led to a registered practitioner profession for which an accredited degree was a requirement of that registration (e.g. nursing) the University would work with the Professional, Statutory and Regulatory Body and with other local universities to arrange transfers of all students to appropriate programmes at alternative providers or to similar programmes within the University.

Risk: loss or suspension of Student Visa licence

Likelihood: Unlikely/Possible

Impact: Major

We monitor our compliance with our licence requirements closely on a regular basis and take active oversight of the requirements of our licence. This is undertaken through a number of channels; these are coordinated by the Visa Compliance Group which reports into the Executive Board and UKVI compliance risks are documented on a specific risk register.

We are performing well against all basic compliance measures (currently our refusal rate is at 1.64%, our enrolment rate is 97.42% and our course completion rate is 96%), and we undertake regular internal and external audits to ensure our record-keeping is compliant with UKVI requirements.

Risk: cessation of operation with overseas partner

Likelihood: Likely

Impact: Minor

We systematically review our overseas partnerships to ensure that they meet our strategic aspirations, and it is likely that we will decide to end our partnerships with some providers. However, where we take the decision to end a partnership, we work closely with the partner and take decisions in consultation with them, which enables us to ensure that existing programmes are taught out, and that any current students are able to complete their programmes. Where cessation is undertaken quickly and with less opportunity to take planned decisions, these principles will be followed to the extent that they can be and to ensure that students are able to complete their programmes. Where this is impossible, we will work to arrange transfers of all students to appropriate programmes with alternative providers.

Risk: inability to secure high quality placements

Likelihood: Unlikely

Impact: Moderate

We have contractual arrangements in place to ensure the availability of high-quality placements and strong partnerships with our placement providers. We work with a number of different placement providers for each programme, ensuring, where possible, that we are not reliant on a single provider. We continually review and expand the range of placement providers we work with to ensure sustainability of our provision, and audit our providers to ensure quality of experience. Should a specific placement provider be unable to deliver placements in any given year, we would work with our other partners to secure suitable placements for our students.

Risk: inability to deliver material components of programmes

Likelihood: Unlikely

Impact: Moderate

We ensure that our curriculum is supported by teams of academic staff to enable us to support delivery, we encourage a team-based approach to research and we ensure that our programmes are designed to not be dependent on the expertise of individual staff. We operate an Academic Workload Model to enable us to flexibly deploy academic staff to ensure continuity of delivery.

Risk: change or closure of material components of programmes

Likelihood: Very likely

Impact: Minor

We regularly review our programmes to ensure that their content is current, relevant, aligned to Professional, Statutory and Regulatory Body requirements as appropriate, and to ensure that we are offering the best possible learning experiences for students. As part of this, it is very likely that we will make changes to modules within programmes. We believe that this is beneficial to students, ensuring that their programmes are up to date, linked to innovative research and provide the best possible overall experience. Changes are carefully monitored to ensure they are only made in the best interests of students or to ensure regulatory or legal compliance.

Risk: inability to support PGR Student Supervision

Likelihood: Unlikely

Impact: Moderate

We provide all students with two supervisors to ensure sustainability and continuity should a member of staff leave. When a supervisor leaves the University's employment, we have arrangements to enable them to continue to supervise University of Bradford students, should it not be possible or appropriate to allocate an alternative supervisor.

How we mitigate our Risks

We have a University teach-out policy which is designed to protect students should we decide to cease operating some of our provision. 'Teach-out' is a phased method of closing provision which allows current students on a programme which we have decided to close to complete their studies before the closure occurs.

If we decide to close or significantly change a programme, we will develop a specific teach-out plan to

support students already studying on the programme to completion. In specific circumstances, this may include substitution of modules, however this will only happen in consultation with students and in such a way that students are still able to meet the learning outcomes of the programme they are studying. Where we have significantly changed a programme, students will be supported to either transfer to the new version or to continue on their original programme to completion through our teach-out planning. This is only ever done in consultation with students and with their agreement.

As set out in our Student Contract, if a student is unhappy with the changes we make to a programme, they have the opportunity to request a transfer to an alternative and appropriate programme (whilst we endeavour to provide this we cannot guarantee that it will be available), to submit a formal complaint through our Student Complaints Procedure, or to withdraw from the programme (any refund will be calculated in line with our Composite Fees Liability Policy, and as set out below).

Our Policy on Refunds

Our refunds policy is set out in our Composite Fee Liability Policy (<https://www.bradford.ac.uk/money/fees/>). This outlines the circumstances in which we will refund tuition fees and any other relevant costs to students and the circumstances in which we may provide compensation in the unlikely event we are unable to ensure continuity of study. Our aim is to resolve any concerns or issues through the measures set out in this plan, and see refunds and compensation as a remedy of last resort.

Many students do not complete a full year of study through their own choice, and therefore we have always made provision in our annual budgets for refunds for students where they may be eligible, and will continue to do this. We also have significant cash reserves and further long-term investments, which ensures that we have the ability to fund refunds and compensation should they exceed the amount we have budgeted for.

The University seeks to minimise change and, where change is unavoidable, puts in place specific plans and arrangements to support and protect students. Under the University's Student Contract, students who are dissatisfied with the arrangements made are entitled to withdraw from the University, and in such circumstances, refunds will be calculated in line with the provisions set out in paragraphs 15-24 of this policy. In the unlikely event of the cancellation of a programme requiring the activation of the University's Student Protection Plan, and where the University has been unable to make suitable arrangements for teach-out or transfer to an alternative programme, the University will refund fees paid for the current level of the affected programme but not for any previous levels completed. (For example, where a student has completed Level 4 and is studying Level 5 at the time the programme is affected, the University will refund fees associated with Level 5 of the programme, but not for Level 4). The University will not seek to recover any student Bursary already paid in respect of study which the University is unable to continue to provide. If the student is provided with alternative provision of study, at the University or elsewhere, any remaining amounts to be paid under the Bursary will be paid.

In the unlikely event of this Student Protection Plan being activated, the University will consider compensation for circumstances occurring as a direct result of situations set out within the Student Protection Plan.

In considering compensation, the University will take into account:

- the context of the situation which has occurred;
- any individual circumstances of students;

- any mitigating actions which have been put in place to support students.

The University will consider a wide range of measures to support students, including assistance with travel costs required by a change to delivery location, and financial compensation should it not be possible to maintain continuity of study. We will discuss compensation with the student or students affected.

Compensation will be benchmarked against guidance from the Office of the Independent Adjudicator for Higher Education.

Where a student is unhappy with the level of compensation offered, a complaint may be submitted under the University's Student Complaints Procedure, under which an independent review of the proposals will be made. Where a student has completed internal procedures under the Student Complaints Procedure, the matter may be referred to the Office of the Independent Adjudicator for Higher Education (OIA) for external review.

How we will communicate with you

We publicise our Student Protection Plan to current and future students by:

- Including the Student Protection Plan within the Important Information associated with our Student Contract. This is available to prospective students from the point of researching higher education opportunities, and is formally provided to all applicants when an offer of a place is made. Students formally accept the terms and conditions of the contract when they accept the offer of a place, and re-confirm their acceptance at enrolment in each academic year of their studies.
- Through our website
- Through our Students' Union
- In our Student Handbook

We ensure that staff are aware of the implications of our Student Protection Plan when they propose course changes by:

- Revising our modifications paperwork to make sure that specific consideration is given to the implications of students already studying programmes;
- Briefing programme review panels;
- Staff training and awareness raising.

Our students are involved in the development and review of our Student Protection Plan through:

- Consultation with our Students' Union;
- Student focus groups;
- Discussion of our Student Protection Plan at the Teaching and Learning Committee and Senate (at which our student body is represented).

Our commitment to students

- In line with our Student Contract, we will inform our students if there are to be material changes to their course at the earliest opportunity by writing to them, via email and through our Virtual Learning Environment.
- We maintain a list of programme changes on our website so that they are easily visible to current and prospective students.
- We will offer affected students the opportunity to meet with us to understand the changes and how we will be working to protect their interests.
- We will take the views of affected students into account in the implementation of the changes.
- We recognise that some of the risks identified in this plan would have a significant impact on students if they were realised, and this may cause students anxiety and concern.

- At the University of Bradford, we have a diverse student population, with high representation from Black and Ethnic Minority students, and students from financially and socially disadvantaged backgrounds. We recognise that the realisation of any risk may have different impact for students from different backgrounds and in differing personal situations. We will therefore seek to ensure that any student affected by such risks is provided with advice and support which is tailored to their individual situation.
- In addition to the measures we have put in place to mitigate risks, we provide a wide range of support services and our Students' Union will also support and advise students individually and collectively. We will develop a specific support plan to meet any situation which arises.

Our commitment to equality

The University recognises that different programmes may appeal to different groups. Consequently, the University will not take a one-size-fits-all approach and the arrangements to be made in connection with the termination or material change of any provision will be specific to the cohort of students affected.

Before this plan is invoked in connection with the termination of any provision, an equality impact assessment (EIA) will be undertaken for the proposed change to assess how any plans may need to differ based on students' needs, circumstances and protected characteristics. The EIA will include:

- an analysis of the protected characteristics for the impacted cohort;
- how closure of provision will impact on students affected due to any relevant protected characteristics; and
- identify, by demographic group, whether any specific remedies or mitigations are needed for particular cohorts or groups of students.

As well as considering the impact of any the termination of any provision on the students affected, the EIA will also consider the following:

- the impact on the needs of wider society;
- the affect that the termination of any provision may have on the University's strategic ambitions; and
- any unintended consequences of the termination of the provision.