

Student Protection Plan for 2022/23

What is the Student Protection Plan?

This is the University of Greenwich's Student Protection Plan for 2022/23. The Plan has been approved by the University's Governing Body and by the [Office for Students](#) (OfS) as required by the OfS Regulatory Framework, which applies to the University as a registered higher education provider. Details of the University's registration are available in the OfS's [Register of Providers](#).

The Student Protection Plan sets out the University's arrangements for protecting the quality and continuity of study for its students. The Plan is tailored to the University's specific circumstances and is based on an assessment of the extent of the risks to the continuation of study for our students. It will be reviewed annually by the Governing Body.

Enquiries about this Student Protection Plan should be directed to the University Secretary's Office: universitysecretary@greenwich.ac.uk.

The Student Protection Plan is structured according to a template provided by the Office for Students in 2018 during the initial registration process.

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

The University of Greenwich has assessed the following as potential risks to students' continuation of studies:

Closure of the University (very low risk)

The risk that the University as a whole becomes unable to operate is considered to be very low, because the institution has historically run its accounts at a surplus and has significant reserves to draw on if required. The University's [2020/21 financial statements](#) indicate that the University and its subsidiaries generated a surplus before other gains of £9.3m in 2020/21, equating to a margin of 4.0% on total income, and had total net assets of £118.9m at the financial year end. The University's financial planning is based on an operating surplus target of greater than 3% of total income and an operating cash as a percentage of income target of greater than 8%, to enable Greenwich to invest to deliver the priorities in its [This is Our Time](#) strategic plan, which sets the goal of being the best modern university in the UK by 2030. The University's financial management information and financial forecasts are regularly reviewed by the Finance Committee and the University's Governing Body to enable any corrective action to be initiated immediately, in the event of a deterioration in the University's financial position. The Finance Committee and the Audit and Risk Committee actively oversee measures to ensure that the University achieves efficiency and value for money in its operations.

The University has an [Emergency Response Plan](#) and a Business Continuity Plan approved by the Vice-Chancellor's Group (the University's executive) and regularly reviewed by senior management. The University's [risk management framework](#) ensures that risks to the institution's sustainability are identified and appropriate risk controls and mitigations put in place. The risk management framework and the Strategic Risk Register are regularly reviewed by the Vice-Chancellor's Group, the Audit and Risk Committee and the Governing Body.

Loss of degree awarding powers (very low risk)

The University was awarded indefinite degree awarding powers under the Further and Higher Education Act 1992. The Office for Students (OfS) Regulatory Framework gives the OfS the power to revoke a provider's authorisation to grant degrees. The risk of this to the University of Greenwich is considered to be very low, as the University intends to fully comply with the OfS Regulatory Framework.

The University actively monitors changes in the OfS's requirements. Regulatory returns required by the OfS are approved in accordance with the OfS's requirements (e.g. by the Governing Body or by an appropriate committee), and the University's executive has agreed a framework to ensure that 'reportable events' are reported to the OfS as required by the Regulatory Framework.

Loss of the University's Student Sponsor Licence (low risk)

The University acts as a sponsor for students coming to study with us from outside the UK. There is a risk for any provider that UK Visas and Immigration (UKVI) could withdraw our licence to sponsor international students. This would mean that these students would not be able to continue their studies with us and would lose their right to remain in the UK unless another institution were able to provide sponsorship.

The risk of us losing our Student Sponsor Licence is considered to be low, because we have a low visa refusal rate for our students, and as a Premium Licence holder with the UKVI, we are able to analyse statistics carefully for our sponsored students to ensure that we remain within UKVI's requirements. The University passed its Basic Compliance Assessment in 2021 to renew its licence with all indicators within the UKVI's thresholds. All aspects of student sponsor operations are considered at a UKVI Assurance Group reporting to the Vice-Chancellor's Group, with any changes to policy approved by the Vice-Chancellor's Group and the Academic Council.

Loss of PSRB accreditation for a programme (low risk)

Some of our programmes of study are accredited by a Professional, Statutory or Regulatory Body (PSRB) and successful completion of some of these programmes will lead to chartered status with the relevant PSRB. It is possible that a PSRB may withdraw its accreditation for one or more of our programmes of study, meaning that students completing the programme would no longer be awarded chartered status.

The risk of the University losing accreditation for one of these programmes is considered to be low. We engage closely with all PSRBs and regularly assess our compliance with requirements for teaching and assessment standards and other key practices.

Changes to supervision arrangements for PhD students (low risk)

The research being undertaken by our postgraduate research students is unique to their research project. Due to the bespoke nature of some of these projects, in very exceptional cases, suitable supervision may be best provided by one particular member of academic staff at the University. In these cases, there is a risk that if the academic member of staff was no longer employed by the University, it would not be possible to reassign the student to another suitable supervisor and the student might need to transfer to another institution. This might involve increased travel time and costs for supervision meetings.

We consider this risk to be low, as it is rare that suitable alternative supervision cannot be arranged within the University, while remote working technology has reduced the risk that a change in supervision to another provider would lead a PhD student to incur additional travel time and costs. In the exceptional circumstance that no suitable alternative supervision can be found within the University, the University's [Postgraduate Research Tuition Fee Charging and Refund Policy 2022/23](#) sets out the refund and compensation arrangements that are available to PhD students. These include a refund of tuition fees for periods of study that are not taken into account by the new provider, compensation for reasonably incurred additional maintenance or travel costs that the student cannot reasonably avoid as a result of their transfer to the other provider, and honouring of bursary/scholarship commitments from the University.

Closure of a collaborative partnership (moderate risk)

The University has collaborative teaching arrangements (sometimes called 'sub-contracting' or 'franchise' arrangements) with a range of partner colleges inside and outside the UK. A list of our collaborations can be found on our website: <https://www.gre.ac.uk/about-us/partner/pcn> (UK partnerships) and <https://www.gre.ac.uk/collaborations/prospective/current-tne> (international partnerships).

There is a risk that one or more of our partners may cease operating, or may cease offering one or more of our franchised programmes of study. These programmes are taught across a wide geographic area and some are taught outside the UK. If a partner were to cease operating or cease offering a programme of study, and for unforeseen circumstances it were not possible to teach out the programme to students already registered, any alternative programme offered to students (at another partner institution or at the University) might be taught some distance away. This would mean increased travel time and travel costs for those students affected.

The risk to students' continuity of study from the closure of collaborative partnerships is considered to be moderate. In most cases, there will be an equivalent programme to the collaborative programme taught at the University of Greenwich, providing the opportunity for partner students to be taught at the University if necessary. We operate a robust approval process for new partnerships, with all partnership proposals subject to approval in principle by the University's Partnership Strategy Group followed by detailed appraisal by the Partnership Working Group. We carry out a regular programme of reviews for all our collaborative partners, including an annual review of each partner's provision, and the reappraisal of partnerships every five years (or earlier, e.g. if there are concerns about the partner).

Each partner college has both a Financial Memorandum and a Memorandum of Agreement, which outlines which courses will be offered under QA/Franchised arrangements and also details termination procedures should a partner college wish to cease offering a course. UKVI licenced provision and any associated risks are closely monitored by the University, both via the Partnership Working Group and via a monitoring survey that partner colleges complete on a bi-annual basis.

Regular monitoring meetings, application reporting and communication takes place between the Partnerships Manager and the Partner Colleges. Support in terms of Away Days and Strategic Planning Meetings also occur on an annual and bi-annual basis.

Additionally, for international partner colleges, regular risk assessments are undertaken assessing recent changes in the operating environment (political, financial and regulatory). As with our UK partner colleges, contracts for international partners detail arrangements for planned teaching-out of existing students. For new validated programmes approved for delivery from the 2019/20 academic year onwards, the provision of a risk assessment and exit plan, dealing with catastrophic circumstances where teaching out is not possible at the existing site (e.g. due to unplanned closure of an overseas campus), is now a mandatory component of the approval procedure. For existing overseas partners and programmes, the University has a time-limited plan in place for these exit plans to be produced.

Since January 2019, UK partners which are further education (FE) colleges have been subject to a special FE insolvency regime. This means that in the event of a college being put into administration, one of the objectives of the administrators is to avoid or minimise disruption to the studies of existing students.

Relocation of a programme (moderate risk)

The University operates three campuses (at Greenwich and Avery Hill in London and at Medway in Kent) and keeps the configuration of its estate under regular review, as part of its academic and financial planning. In some cases, this may mean that a programme is transferred from one campus to another in the interests of efficiency and sustainability, or to provide improved facilities for students. This may mean that some students incur unanticipated travel costs and additional travel time as a result of the move of their programme to a different location, e.g. where students have chosen accommodation due to its proximity to the campus where their programme was originally taught. There could be additional implications for students who have disabilities that make travel between locations difficult.

The risk to students' continuity of study is considered to be moderate, as two of the University's campuses (Greenwich and Avery Hill) are in relatively close proximity, and a regular bus service is provided by the University between the three campuses.

Closure of a programme (moderate risk)

The University keeps its portfolio of programmes under regular review, and may occasionally discontinue a programme for reasons of academic or financial sustainability or as part of ensuring the currency of our offering. The closure of all programmes is subject to approval by the University's Programme Approval Committee and must include consideration of how the interests of current and prospective students are protected.

The risk to students' continuity of study is considered to be moderate, as the University's normal practice is to 'teach out' programmes which are closing to ensure that students receive the degree that they registered for.

Changes to a programme (moderate risk)

The University keeps its programmes under regular review, and will make changes to programmes (e.g. to their structure or content) to ensure the currency of our offering and to ensure that programmes are academically and financially sustainable. Many changes are made in response to feedback from students, and are intended to improve the academic experience of students and students' academic outcomes. Changes to programmes require formal approval under the University's academic quality assurance procedures.

The risk to students' continuity of studies is considered to be moderate. The University will take all reasonable steps to minimise the impact of any material changes to programmes on students' continuity of study (e.g. by phasing in changes or implementing changes on a 'no detriment' basis), and will consult with students about any material changes to programmes which might affect them. As indicated, many changes are intended to be beneficial to students and to improve student outcomes.

Epidemic / pandemic of disease (moderate risk)

The Covid-19 pandemic which commenced in the UK in 2020 affected the University's operations in 2019/20 and 2020/21 as a result of lockdowns and restrictions imposed by the UK government. The University has safely carried out on-campus teaching and activities throughout the 2021/22 academic year, avoiding significant outbreaks by implementing Covid safety measures that reflected government guidance. The UK government has now removed all Covid-19 restrictions and has replaced its Covid-19 guidance for universities with guidance on managing infectious diseases in education and childcare settings. The University is planning for normal on-campus teaching and activities in 2022/23 following the safety measures in our [Infection Control Guidance](#), which reflects the latest government guidance.

While the risk from Covid-19 is receding, there remains what we consider to be a moderate risk that continuity of study could be disrupted in 2022/23 by a major outbreak or by national or local restrictions that might be imposed by government, e.g. in response to a significant increase in Covid-19 cases or a new variant. If this were to happen, the risks to continuity of study might include disruption to teaching and assessment resulting from government requirements to cease or reduce on campus activities; those requirements also affecting students' ability to access key learning and study facilities such as libraries; placement providers withdrawing or discontinuing placements for students; and students' lack of access to IT facilities affecting their ability to study remotely.

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

This section covers the measures which we have put in place to mitigate the risks which we have identified as 'moderate' in the section above, on the basis that these are risks with a greater likelihood of being crystallised. We are committed to providing students with support and advice in the event that any of these risks crystallise, and this section describes how we will do so. Free, independent advice to students affected by changes is also available from Greenwich Students' Union's [Advice Service](#).

Closure of a collaborative partnership (moderate risk)

Where the decision is made to discontinue a partnership programme or in the event of the unplanned discontinuation of a partnership, the University's [Guidelines on Teach-out](#) set out the steps that will be taken to support students and enable students to complete their programme and achieve their award. The planned discontinuation of a partnership programme will normally be followed by the teach-out of the programme by the partner. Where the discontinuation is unplanned (e.g. due to failure by the partner), the potential measures set out in the Guidelines to ensure continuity of study include provision of the programme by distance learning; the transfer of students to another local provider offering the same or a similar programme; delivery of the programme by flying faculty or block release; or facilitating the transfer of students to an equivalent programme taught at the University.

The relocation of students to another provider or to the University may involve inconvenience to some students, for example increased travel time and costs. The University will compensate students for reasonable additional travel costs incurred as a result of the transfer of their programme, with claims for compensation to be considered on an individual basis.

In the rare situations where a franchised programme or set of programmes can no longer be delivered by a collaborative partner and it is not possible to transfer the student to the same programme of study at the University or one of its other partners, the University will assist the student in transferring to a different programme at the University or to a different programme at another provider. Any compensation will be as set out in paragraph 14(e) of the University's [Regulations on Student Financial Matters](#) (undergraduate and postgraduate taught students).

In the exceptional circumstance that a franchised programme is closed and the University is not able to preserve continuation of study, compensation arrangements will be as set out paragraph 14(g) of the University's [Regulations on Student Financial Matters](#) (undergraduate and postgraduate taught students).

Relocation of a programme (moderate risk)

Wherever possible before transferring a programme to a different campus, the University will consult with students and discuss measures to mitigate the impact of any transfer (it may not be possible to do this in all cases, for example, in emergency situations).

As indicated, the University provides a regular bus service between its three campuses, two of which (Greenwich and Avery Hill) are in close proximity. Compensation arrangements in the event that a student incurs additional travel costs as a result of the relocation of their programme are covered by our [Regulations on Student Financial Matters](#) (undergraduate and postgraduate taught students).

Closure of a programme (moderate risk)

In the event that the University is unable to continue offering a programme of study for any reason, wherever possible we will 'teach out' the programme, ensuring that students who already registered complete their studies with us. The University's [Guidelines on Teach-out](#) set out the steps that will be taken to support students and enable students to complete their programme and achieve their award.

Should this not be possible, we will seek to transfer students to another programme at the University, or to engage with other providers and aim to find places on equivalent or similar programmes of study. Efforts would be dependent on the nature of the programme and whether other providers have capacity; there is therefore no guarantee that we would be able to place all affected students with other providers. Compensation arrangements in the event of the closure of a programme are covered by our [Regulations on Student Financial Matters](#) (undergraduate and postgraduate taught students).

Changes to a programme (moderate risk)

As indicated, the University will take all reasonable steps to minimise the impact of any material changes to programmes on students' continuity of study (e.g. by phasing in changes or implementing changes on a 'no detriment' basis), and will consult with students about any material changes to programmes which might affect them.

The University's [quality assurance procedures](#) include guidance for staff on what types of changes to programmes have implications for compliance with the Competition and Markets Authority's guidance for universities and when consultation and communication with students should take place. This includes pro formas to be used for providing information to students about changes, consulting with students and feeding back the outcome of consultations.

Please note that in emergency situations, we may need to make changes to programmes swiftly to ensure continuity of study and minimise disruption to students. Where this happens, we will communicate with students about changes that affect them and will consult with students/the Greenwich Students' Union where reasonably possible.

Epidemic / pandemic of disease (moderate risk)

As indicated, the University is planning for normal on-campus teaching and activities in 2022/23 following the safety measures in our [Infection Control Guidance](#), which reflects the latest government guidance.

The Infection Control Guidance includes the University's outbreak plan which has been discussed with our local authority public health partners. This sets out the principles that we will follow in the

event of a major Covid-19 outbreak or increasing restrictions affecting our campuses. In particular, it emphasises that:

- Any measures or restrictions which we put in place beyond our usual infection control measures will be informed by discussions with the UK Health Security Agency and/or the relevant local authority Director of Public Health;
- We will prioritise the continuation of face-to-face teaching and on-campus activities. Limitations on students' on-campus attendance will only be imposed on a short-term basis as a last resort after other measures and following public health advice;
- Where measures are required that go beyond those required by our Infection Control Guidance, we will initially focus on measures which do not impact on students' attendance (e.g. enhanced cleaning and hygiene, increased communications to staff/students, moving activities outdoors where possible, reviewing ventilation, limiting residential field trips, mandatory wearing of face coverings following public health advice);
- Where it becomes necessary to limit students' attendance, we will do so following public health advice. This might happen where other measures have failed to break chains of transmission or where our campuses are in an area which is subject to restrictions (e.g. in response to a new variant of Covid-19). We anticipate that limiting attendance would be done in a phased way, initially by reducing teaching on site and increasing social distancing; then by prioritising on site teaching for 'practical' courses where on campus teaching is most beneficial; and finally by prioritising on-site teaching for those courses where on campus teaching is essential.

In the event of another national lockdown or major local restrictions, we would re-introduce measures similar to those which we introduced in 2019/20 and 2020/21 to ensure continuity of study during the Covid-19 pandemic. These have included:

- Moving teaching and assessment online where required by government guidance or Covid safety requirements to enable students to progress and complete while our campuses are closed;
- As indicated above, where limited on campus teaching is permitted by government guidance, prioritising subjects with a 'practical' component or where on-campus teaching is essential (e.g. health courses, lab-based subjects);
- Where permitted by government guidance, prioritising access to key on campus facilities which support students' learning such as libraries, including moving to 'click and collect' services as a last resort where we are permitted to do so;
- Implementing emergency amendments to our academic regulations to enable students to progress and complete;
- Implementing a 'no detriment' policy for students to help students demonstrate their full potential and counteract any detrimental impacts the pandemic may have on their assessments;
- Engaging with our partners in relation to their business continuity plans;
- Introducing an expedited student complaints procedure to ensure the swift and consistent handling of complaints relating to major disruption;
- Where students' placements have been disrupted by providers withdrawing or discontinuing placements because of the pandemic, proactively engaging with students to mitigate the impact

of missed placements and, where appropriate, offering alternative options for completing their programme which meet the programme's quality standards, or the option to complete the placement element of their programme at a later date;

- Measures such as laptop loan schemes to address 'digital poverty' among students;
- Delivering teaching and assessment online or through local partners to International students who may be prevented by Covid-19 from travelling to the UK;
- Implementing Covid safety measures (e.g. social distancing, mandatory wearing of face coverings and Covid testing) in line with government guidance in place at the time;
- Promoting the uptake of vaccination among students and staff.

If any of the above measures become necessary, we will communicate with students about changes that affect them and will consult with students/the Greenwich Students' Union where reasonably possible. Further information about how we will communicate in the event of an outbreak is provided in our [Infection Control Guidance](#).

Information about the policy we have in place to refund tuition fees and other relevant costs to our students and to provide compensation where necessary in the event that we are no longer able to preserve continuation of study

Our refund and compensation policies are set out in our [Regulations on Student Financial Matters](#) (undergraduate and postgraduate taught students) and our [Postgraduate Research Tuition Fee Charging and Refund Policy 2022/23](#) (postgraduate research students).

As indicated, the University had total net assets of £118.9m as at 31 July 2021. We believe that our reserves would be sufficient to provide refunds and compensation for the students for whom we have identified an increased risk of non-continuation of study.

Information about how we will communicate with students about our Student Protection Plan

We will communicate our Student Protection Plan to current and future students by publishing it on our website, by signposting the Student Protection Plan in our [Terms and Conditions](#) for applicants and in our [Principal Conditions of Registration](#), and by linking to the plan in our students' programme handbooks.

We will communicate the Student Protection Plan to staff by the staff e-newsletter. We will ensure that staff are aware of the implications of our Student Protection Plan when they propose programme or course changes by linking to the plan from our quality assurance procedures and from our guidance on teach-out.

Our original Student Protection Plan was developed by a senior management working group that included representation from the [Greenwich Students' Union](#). The student protection plan is reviewed annually and the Students' Union is consulted on any revisions. The Student Protection for 2022/23 was approved by the University's Academic Council and the Governing Body, both of which include representation from the Students' Union.

The Student Protection Plan covers a range of potential risks to students' continuity of study and what the University will do in the event that a risk crystallises. How we will communicate and consult with students will depend on the nature of the situation in which the Student Protection Plan has to be implemented. This might include communication with individual students (e.g. with a PhD student where no suitable alternative supervision can be found within the University); with the students on a collaborative partnership which is being discontinued; with the students on a programme which is being changed, closed or relocated; or with all students on one or more of our campuses (e.g. in the event of restrictions being imposed by government due to Covid-19). When we communicate with students about changes, we will inform students about the free, independent advice available from Greenwich Students' Union's [Advice Service](#), as well as the support available from the University. As indicated, our [quality assurance procedures](#) include guidance for staff on when communication and consultation with students about changes to programmes should take place.

The overarching principle is that, wherever possible, we will consult with students at the earliest opportunity to ensure that students are fully informed and can provide their views. We will normally do so through the Greenwich Students' Union (which is supported by the University to provide students with independent advice and representation), and through existing mechanisms that we use to involve students in their teaching and learning, such as student representatives on programme committees.

Information about students' right to complain

Students who are dissatisfied with changes affecting them and how the University has implemented the measures set out in this Student Protection Plan may complain to the University using the University's [Student Complaints Procedure](#). If a student remains dissatisfied having completed the University's complaints process, they may be able to complain to the [Office of the Independent Adjudicator for Higher Education](#) (OIA), which provides a free, independent ombudsman service for the higher education sector. Students may also seek free, independent advice about their complaints from Greenwich Students' Union's [Advice Service](#).

Approved by: Governing Body, 28 June 2022

Approved by Office for Students, 22 September 2022

Date of next review: June 2023