

STUDENT PROTECTION PLAN

Introduction

1. In line with the guidance of the Office for Students, the Richmond Student Protection Plan (SPP) has been prepared to “set out what students can expect to happen should a course, campus, or institution close. The purpose of a plan is to ensure that students can continue and complete their studies or can be compensated if this is not possible.” The SPP has been prepared in accordance with Condition C3 of the Regulatory Framework, November 2022 (and with regard to Condition C4, implemented in April 2021).
2. The Student Protection Plan was written in consultation with the Student Government Association. The SPP covers all current students, prospective students, undergraduate and postgraduate degree seeking students, as well as non-degree visiting and study abroad students.
3. The University awards both a US and UK degree, which puts us in a fairly unique position in the UK. In the event of the University ceasing to exist, it may not be possible for students to transfer to a UK provider which will award both a UK and US accredited degree. However, we can assist students in finding UK degree programmes with the major subject areas that they are pursuing.

Risks

In this section we provide an 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. We also present the measures that we have put in place to mitigate those risks that we consider to be reasonably likely to crystallise.

In most of the risks outlined below, the likelihood of the individual risk materialising is considered low, except in the event the University faces institutional closure and full market exit, which is medium to low.

1. The University is no longer able to deliver one or more of its degree programmes.

The risk that the University is unable to offer one or more of its degree programmes is low. Programme revalidation takes place every 5 years, and the University has decided, on occasion, to discontinue a degree programme. However, our core curriculum model is

structured in such a way that it significantly reduces direct degree programme costs by offering economies of scale with other programmes through extensive course sharing. This means that degrees with low enrolments can be maintained based on economies of scope and economies of scale.

The Richmond International Academic and Soccer Academy (RIASA) programme, based in Leeds, has successful enrolment and profitability. In the event of institutional closure, we will assist students in transferring to similar programmes which have already been identified in Leeds, York and London should they choose to do so.

If the University decides to discontinue a programme, it will 'Teach Out' the students currently enrolled in the programme and not accept any additional cohorts.

There are substantial, ringfenced funds in a Richmond endowment fund to be used by the University in the event of institutional closure.

1.1. Measures to mitigate risks:

If the University is unable to continue offering a specific degree programme, the University will take the following steps as outlined in the Quality Manual:

- a) Ceasing marketing activity.
- b) Pausing new student enrolment at all levels of the programme.
- c) Informing any prospective students to ensure that their opportunities are not jeopardised.

1.2. For current students affected by the closure of a programme:

Whenever possible, the University will plan to 'Teach Out' current students where the University has decided to close a programme. The University commits to ensuring programmes of study can be completed by all currently enrolled students within existing periods.

- a) A Major Meeting will be convened to discuss the implications.
- b) Students on Leave of Absence or Study Abroad will be notified by e-mail and provided with guidance.
- c) The relevant department and/or student advisor will provide individual guidance on options to all students affected.
- d) Students will be provided with individualised advice on any courses that they must take to complete the programme.
- e) The University will offer all modules or appropriate substitution modules until all current students have completed the programme ("Teach Out"). Should an optional condensed timetable be offered whereby students can finish the programme earlier by attending additional classes in summer, the University will consider special fee arrangements.

- f) Students who wish to transfer to other majors or institutions will be given assistance with their options by Registry Services and transcript fees for the purposes of institutional transfer application will be waived.
- g) Students who have withdrawn from the University (officially or unofficially) will not normally be permitted re-admission to the University onto the programme during the programme discontinuation process.

Should a decision be taken to close operations at Leeds whilst the University is still in operation, we will assist students in transferring to a similar programme which has already been identified should they choose to do so. The International Sports Management programme in Leeds includes a football component and it will be difficult for an individual student to find a similar programme, although a transfer to another HE provider of the sporting component, delivered under contract to Richmond, may be possible.

The University will undertake equality impact assessments to assess the effect on students with diverse needs, characteristics, and circumstances. Should it not be possible to 'Teach Out' a specific degree programme, the University will consider all options to change programmes at the University and/or assist students in transferring to another institution to complete the programme.

1.3. For prospective students affected by the closure of a programme:

Where a prospective student has applied for a Richmond programme, but has not yet enrolled, they will be notified (in accordance with UCAS deadlines where appropriate) to source an alternative suitable programme, where relevant, at the University or alternatively, at a different provider. We will provide the student with support and advice in these circumstances. Students can seek refunds which will be assessed in line with the University's Refunds and Withdrawals Policy. Any refund request for associated costs would be in line with the policy.

1.4. For applicants affected by the closure of a programme:

Where material changes are made to the structure or content of programmes, these will be communicated to applicants as soon as possible. They will be advised of their ability to choose another University programme or withdraw their application to seek entry to another institution.

Should the applicants have already accepted an offer, advice and guidance will be provided by the University to help them make an informed decision about their options and course of action.

Applicants who have accepted offers or have been made offers but have not yet accepted them will be informed and contacted as soon as any decisions regarding closure of programmes have been agreed.

If a student believes that the change has adversely affected them, they may cancel their contract with the University. In such circumstances, the University will offer advice and guidance and, where possible, facilitate a transfer to another institution which offers a programme for which they are suitably qualified.

2. The University is no longer able to deliver one or more required modules (courses) to students.

The risk that the University will no longer run components of a degree programme is low. The University may choose to revise degrees and cancel modules because of feedback and to ensure.

Students who withdraw “unofficially” are those students who have not returned or, rarely, students who leave mid-semester and in both cases the student has not completed the required forms. If a student has poor attendance rates or decreasing lack of engagement with the University, the Student Affairs Department makes every effort to reach them, including calling, emailing, contacting them via social media, etc. that both quality and the Subject Benchmark Statements as outlined by the Quality Assurance Agency (QAA) are met. The University may also choose to not run a module (course) if it has low enrolment or if an instructor decides at late notice to no longer work for the University and the University is unable to find a replacement. The University may choose to adjust or cease an element of a programme if the element is resource intensive.

Degree Programmes in Richmond are structured at each level by required modules and optional modules (usually from a list). The risk of cancelling required modules is low as this is normally done at the point of programme revalidation which takes place every 5 years.

The risk presented to students if there is a cancelled or revised optional module is low as there are alternative optional modules that students can choose to fulfil programme requirements.

2.1. Measures to mitigate risks:

When the University is unable to deliver a specified module (course), the University will inform affected students of the module (course) cancellation and they will be offered a reasonable substitution to fulfil their programme requirements. Given that the University’s curriculum model is structured to include extensive course sharing between programmes, the closure of a specified module (course) will not disadvantage students in fulfilling their programme requirements.

3. The University is not able to award the qualifications for which its students are registered.

The risk of the OfS revoking the University Taught Degree Awarding Powers and the Middle States Commission on Higher Education (MSCHE) revoking its accreditation is regarded as low. The University has well-established quality assurance processes and ongoing monitoring procedures which would enable the University to put the necessary action plans in place to address any areas of concern. In addition to meeting UK requirements the University must meet equivalent US requirements. Parallel but mutually reinforcing processes are in place to ensure both US and UK standards are met.

3.1. Measures to mitigate risks:

If significant quality concerns were identified by the OfS, the University will work with the OfS to address these and put the necessary actions in place. Before the University would be considered non-compliant by the MSCHE, the University would enter a period of MSCHE-enforced warning and continued warning. The University has experience in working with MSCHE on compliance and has incorporated many of the lessons learned from this successful process. If this were to happen again, the University will put the necessary actions in place to address the probationary process.

4. One or more of the locations at which the University delivers courses to students is no longer available.

The risk of the University having to close its new campus is low, given that we successfully relocated to Chiswick Park in Summer 2022 to obtain long-term stability and security for our staff and students. The new location in Chiswick Park will enable us to continue to grow and expand, which will increase our future stability.

The risk of the University having to close the location of its RIASA programme is low due to the successful relocation of RIASA to the Weetwood Hall Estate and Bodington Football Club near Leeds.

4.1. Measures to mitigate risks:

The University successfully relocated to Chiswick Park in London with very little disruption. The new location provides a high level of security and stability for the University, with impressive facilities and room for expansion.

Now that the University is located within one building in Chiswick Park, and RIASA is settled into its new location at Weetwood Hall, the risk of partial closure is very low.

In the unlikely event that there are difficulties remaining in our current locations in London and Leeds, Equality Impacts Assessment will be undertaken to ensure that the University is considering the needs of distinct groups of students. Should students have exceptional circumstances that require reasonable adjustments, the University will consider these on a case-by-case basis and the University will discuss any reasonable costs that might be incurred.

5. The University's Student Visa sponsor status is suspended or revoked.

The University is diligent in ensuring that it continues to meet the UKVI requirements. The University will work closely with UKVI to ensure that it remains compliant, as a suspension or revocation of the University's Student Visa sponsor status would have a significant impact on the University due to the international profile of the student body.

5.1. Measures to mitigate risks:

In the unlikely event that the University's Student Visa sponsor status is suspended, we will take all reasonable steps to minimise disruption to students. The University will:

- a) Contact all current international students to provide individual advice on whether they will be permitted to remain at the University to complete their students or whether they will need to return to their home country to secure a place at another provider and, subsequently, make a new visa application.
- b) Contact all prospective students to advise them of the suspension.
- c) Provide support in securing a place at a different institution.
- d) Offer the student the opportunity to postpone an application to the University pending the resolution of the suspension.
- e) Provide support to students in transferring to another provider with Student Visa license.
- f) Work with UKVI to allow a student to complete the current year of study or programme.
- g) Discuss with UKVI the possibility of becoming a legacy sponsor to 'Teach Out' all currently enrolled students on Student Visas.

If the University's Student Visa sponsor status is revoked, we will take all reasonable steps to minimise disruption to the student by assisting the student to switch to an alternative sponsor, whilst maintaining full compliance with UKVI procedures.

6. A programme loses its accreditation from a Professional, Statutory or Regulatory Body (PSRB)

The University works proactively to maintain accreditation of its PSRBs and so the risk for a programme to lose its accreditation from a PRSB is low.

6.1. Measures to mitigate risks:

If a programme loses its accreditation from a PSRB, the University will work proactively with the PSRB to address all issues concerned and ongoing communications will be maintained.

The University will consider measures to protect the student, such as:

- a) Offering the chance to move to another programme.
- b) Delivering a modified version of the same programme.
- c) Discuss the option of 'Teaching Out' existing students.
- d) Aiding switch to a different provider who has the relevant accreditation.

7. The University is no longer able to operate

The risk of University closure is medium to low. The financial difficulties encountered by the University in Spring 2020 mean that there is significant knowledge and expertise in preparing for cessation of operations.

The risk of institutional financial health is monitored in accordance with the regulatory body requirements of financial reporting and annual account auditing as outlined by the OfS and the University's US accreditor, Middle States Commission on Higher Education (MSCHE). A partnership with China Education Group was agreed in March 2020 which provides support and borrowing facilities for the University.

In the unlikely event of a cessation of operations, we will undertake Equality Impact Assessments to assess the effect on students with diverse needs, characteristics, and circumstances. The University keeps student details in our student record system. This system can be used to run reports to help categorise students and assess how many students may fall into the distinct categories. The University uses this information to then plan and adjust depending on the specific needs. For example, students with low GPAs will be identified and advised on which courses they should consider retaking to increase their GPAs and improve their transfer applications and timeline to graduation.

7.1. Measures to mitigate risks:

In the highly unlikely event of institutional closure, the University will follow the process outlined in the "Middle States Commission on Higher Education: *Teach-Out*

Plans and Agreements Policy and Procedures.” These procedures include those listed below:

- a) Seek to merge with another institution or seek an appropriate change of ownership and control or partnership, to maintain all or part of the University’s current provision.
- b) The University will assess the alignment and mapping of programmes and assist students in case of a change of majors if necessary.
- c) For any students who do not wish to transfer to the new institution, the University will support them in applying to other institutions.
- d) Where possible, keeping the institution open for as long as possible during a ‘Teach Out’ period to allow a student to complete studies at the University.
- e) The University will review the period that cash flow would permit the University to remain in operation. It will then analyse the student body and make changes to the provision of courses whenever possible so that the greatest number of students will be able to complete their studies.
- f) Where the above is not possible, the University will support transfer to an appropriate programme at another provider.
- g) The University will identify and contact suitable providers for students to transfer their credits, subject to admissions criteria.
- h) The University will organise “transfer fairs” to allow students to have the opportunity to speak to and choose a new provider.
- i) For any students who do not wish to transfer to one of the suggested providers, the University will support them in applying directly to other institutions.
- j) Present all qualifying students for UK and/or US exit awards to the next University Examination Board and issue certificates.
- k) Provide transcripts for all students demonstrating credits earned up until the point of closure.
- l) Archive academic records to allow graduates students to access evidence of their academic achievement in perpetuity.
- m) Create a data repository so that all alumni have access to their transcripts.

8. The continuity of study of students on validated courses in partner organisations is disrupted by factors beyond the University’s control.

The University validates degrees with a small number of carefully selected partner organisations. We apply rigorous oversight to these relationships through the monitoring of academic standards, learning resources and staff resources. We are cognisant of the fact that any partner organisation may face circumstances in which they may need to cease some or all their operations.

We recognise that under the regulatory framework it is the responsibility of the provider where the student is registered to put in place student protection measures, and that our partners therefore have primary responsibility for this. However, the University will always

work closely with its partners to mitigate the impact of any disruption upon students including through the provision of advice, guidance, and academic oversight when necessary.

9. Communication Plan and Information for Students

This sub-section provides 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 if we are no longer able to preserve continuation of study. If one of the risks outlined above occurs, the focus of communication will be around informing students of the impact on them. The process for governing communications is outlined below, along with methods for monitoring the effectiveness of the communication. These processes and methods will be the same in any event that any of the risks occur.

Once the detail of the specific risk that has occurred is clear, the content of the bespoke core messages and the detailed Q&A will be customised around the specific scenario to support students in understanding the circumstances and implications.

The University continually consults with Student Government and adopts mechanisms to obtain student feedback. In a time of change, confusion or conflict, the University opens support centres, call lines, etc. which will be publicised to the students. Each student's concern is tracked and responded to. Communication and support structures are then adapted based on the needs of the students.

Student Affairs is heavily involved in keeping the students informed beyond initial communication. They set up meeting times to speak to students, counsellors are available, members like ResLife, Peer Mentors and the Student Government are assisted by staff to better support students.

9.1. Communication Structure for Students

The Communications Plan will include campaigns and activities that target each relevant group relating to the communication/Information, Advice and Guidance (IAG) service offered to students.

The first stage of the Communication Plan is to prepare a comprehensive set of messages and content that can be produced in various formats across digital and printed communication media. Emails will be supported by SMS messaging to improve the opening rate wherever possible. The content of the Communications Plan will include:

- a) Background to the situation and what is happening.
- b) List of contact points where students can get more information face-to-face.

- c) List locations / dates of Student Information Meetings or Student Government Meetings.
- d) Scripts for all student-facing staff.
- e) Comprehensive Q&A to support all student information and will be published on the website and student portal.
- f) A staff information pack containing most of the above information. Staff will also be receiving an 'employee communication campaign' explaining how the change will impact them.
- g) The Communication Plan schedule will ensure that staff are fully briefed on the situation, how it affects them and the students before the student Communication Plan is deployed.

9.2. Monitoring of reach and effectiveness of IAG

The University's Customer Relationship Management System (CRM) allows for monitoring of open rates on emails, and email announcements are accompanied by an SMS message to students where possible.

If the reach of the messaging is not sufficient, the Student Government Association will be instrumental in supporting messaging and ensuring students are provided sufficient opportunity to understand the circumstances and their options. The University also tracks student queries and responses. This allows the filtering of different student concerns to the appropriate departments, ensuring that the students are being supported throughout the process, beyond their initial query.

Tracking the type of queries also allows for information to be adjusted to be more focused on their concerns.

9.3 Student Support – Mental Health and Wellbeing

The University has a dedicated Student Health and Wellbeing Officer, who is responsible for coordinating all the aspects of our student health and wellbeing strategy alongside other Student Affairs team members, Registry staff, faculty, and external support.

The University offers:

- a) Personal counselling via counsellors based in both London and Leeds, who offer in-person appointments on-campus, in private practices, or online. All students are eligible for 6 free sessions per term. Information on counsellors, including email information to book directly and confidentially, is available on the University website: <https://www.richmond.ac.uk/student-life/health-care-and-counselling/>

- b) Social and physical activities convened by clubs and societies throughout each term, in addition to dedicated wellbeing week activities planned around key assessment periods.
- c) Access to the London Nightline listening service for confidential, anonymous, non-advisory listening.
- d) Periodic meetings with a named individual staff member for students who manage long-term additional needs (bookable at <https://students.richmond.ac.uk>), and.
- e) Peer-based mentoring and tutoring for students experiencing challenges transitioning into new stages of University or academic life.

The Student Health and Wellbeing Officer shares a case load of students with the Student Affairs team and the Case Manager in Registry Services. These are students who may be experiencing poor physical/mental health, care responsibilities, financial problems, family issues, specific educational needs/disability, or a combination. These cases are discussed at team meetings regularly to ensure the students have the proper level of support throughout their studies.

Additionally, the Student Health and Wellbeing Officer works with local doctor surgeries and NHS wellbeing centres, area helplines, local charities, and emergency support to ensure students are aware of the community services available to them. The Officer also works with student groups, particularly those in the Richmond Psychology Association, to raise awareness about mental health concerns in young people.

The University employs staff trained in Mental Health First Aid in-line with our Health and Safety Policy, and the Student Affairs team works to ensure appropriate training, support, and points of escalation are available to student-facing colleagues.

9.4 Estates Considerations to Ensure Continuity of Study for Students

The University has a duty of care to students in providing safe locations for their use. As a result, continuous surveying and delivery of robust planned preventative maintenance takes place at all University sites to prevent any catastrophic failure of plant, equipment, or structure. If an unexpected maintenance need arises, robust student support services are in place, and will remain in place if any of the risks occur.

As a result, the following actions are taken:

- a) Maintenance and upkeep on all leased properties.
- b) Daily, on-site security for all campuses.
- c) Security provided 24/7 by Enjoy Work (Chiswick Park management).
- d) Operation of canteen services.

- e) Responding to maintenance requests from students and staff.
- f) Project work resulting from the findings from any external assessments.

Continuing these actions will mitigate any negative impact to students if a risk materialises.

The University is committed to ensuring a safe learning environment for its students and adhering to guidance provided by the UK Government. The University is also taking steps to mitigate effects on the student experience such as by improving the virtual learning environment that students use. Staff and students are regularly surveyed by the University for feedback about the learning environment.

10. Refunds and Compensation

10.1. Introduction

The University's Refund and Compensation policy should be read in conjunction with our regulations, policies and procedures and the Student Protection Plan (SPP). In the event of any conflict between any of these, then the regulations, policies and procedures shall take priority, followed by the SPP and then the Refunds and Compensation policy.

Students are not able to obtain redress under either the SPP or the Refunds and Compensation policy and might be given a choice between the two. The University will always deal with specific refund and compensation requests and claims fairly and in accordance with its obligations under consumer law.

The policy only applies to students studying with Richmond, The American International University in London on one of its campuses in England.

10.2. Programme suspension/discontinuation

In exceptional circumstances, it may be necessary for the University to revise the content or delivery of programmes or discontinue or suspend programmes. It is possible that the University may also cancel a programme before it starts if deemed not viable for academic, regulatory, legal, commercial, financial, or other reasons.

This policy would only be applicable to students who have already applied and accepted an offer to study on the programme at the time of suspension or discontinuation.

We work hard to deliver any changes to our provision to minimise disruption to students and to enable students to complete their studies as intended, however, after exploring all viable options, there may be occasions where it is not possible for the University to do so. In these cases, students may be eligible for a refund of fees and

other payments made to the University, in full or in part, and/or compensation for other losses they have incurred.

How to make a claim:

- a) Students will need to submit their claims for consideration to the relevant Head of Department.
- b) Eligibility for a refund and/or compensation, and the amounts to be awarded, will be considered by the Director of Finance.
- c) In some cases, we will establish set rates for compensation of accommodation or travel costs, which will be applied automatically to all affected students. We will explain clearly how we have calculated these set rates.
- d) In other cases, we may ask students to provide evidence of costs which they have incurred for which they are seeking compensation.
- e) Students will be advised about what will happen and what they will need to do at the appropriate time.

10.3. Compensation and Refund considerations

The University will consider eligibility for refund and/or compensation on a case-by-case basis and will consider factors including (but not limited to):

- a) Scale and impact of the matters affecting students.
- b) Travel or accommodation costs (e.g., where students are having to relocate because the University must move the programme to an alternative location or students must transfer to another provider).
- c) Maintenance costs (e.g., childcare if student contact sessions must be delivered at times outside the normal University teaching day/week).
- d) The mitigation the University has put in place that students may or may not have taken advantage of – including the provisions set out in the Student Protection Plan.
- e) How much of the programme students have completed.
- f) What is reasonable in all circumstances.

Eligibility for a refund and/or compensation, and the amounts to be awarded, will be considered by the Finance Team in the first instance. In some cases, the University will establish set rates for compensation of accommodation or travel costs, which will be applied automatically to all affected students. The University will explain clearly how we have calculated these set rates. In other cases, the University may ask students to provide evidence of costs which they have incurred for which they are seeking compensation. Students will be advised about what will happen and what they will need to do at the appropriate time.

10.4. Exceptions

This policy does not cover instances where students may be considering withdrawing from or interrupting their studies for personal reasons. If students are thinking about this, they will be instructed to contact the programme leader and seek advice.

If students decide that they do not want to continue with their studies, it is important that they withdraw correctly or interrupt study in accordance with the University's policies and procedures as there are academic and financial implications that need to be considered. For international students there will also be implications regarding visa status.

The University does not accept any liability for any consequential or other economic loss (including loss of profits, loss of goodwill or loss of opportunity) resulting from any of the matters covered by this policy. Only foreseeable loss will be covered by the University.

10.5. Complaints Procedure

If the University makes a proposal for a refund or compensation that a student does not consider to be acceptable, then the student can file a complaint by following the University's **Student Complaints Procedure**. This policy will be considered by the University in relation to any complaint it receives.

To appeal to the University's decision, students can write to the Office of the Independent Adjudicator for Higher Education (OIA) to review their complaint. Students can only refer their complaint to the OIA when they have exhausted Richmond's complaints procedure.

10.6. Review of policy

This policy will be reviewed regularly and updated and amended as required. The University reserves the right to amend this policy from time to time based on legal or regulatory changes affecting students or the University or to follow best practice in the higher education sector.

10.7. How we will publicise the SPP

The University will publicise the SPP to current and prospective students by making it available on the University's website and by making it available at appropriate student forums.

The University will ensure that staff are aware of the implications of our SPP when they propose courses or programmes by ensuring the policies and procedures included in the Quality Manual are followed and that the Curriculum Development Committee, the Academic Board and the University Board make decisions in accordance with university policy.

The University will review the Student Protection Plan regularly and engage students in its review via the University’s committee structure, offer it for comment to the Student Government Association, and via relevant committees. It will also be subject to review and approval by the Board of Trustees.

The University will inform our students if there are to be material changes to their course in accordance with the requirements laid out in the Quality Manual, which includes engaging students in decision-making related to programme change and development.

The University will normally give students one semester's notice when it needs to make material changes to their programme.

Acronym Guide

CRM – Customer Relationship

Manager IAG – Information,
Advice, and Guidance

MSCHE – Middle States Commission on Higher

Education OfS – Office for Students

OIA – Office of the Independent Adjudicator for Higher

Education PSRB – Professional, Statutory, and Regulatory
Bodies

QAA – Quality Assurance Agency

UCAS – Universities and Colleges Admissions Service

Responsible Department: Provost’s Office			
Approving body: University Board			
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002	N/A	Fall 2023	2023-24