



Student Protection Plan

09 July 2021

Introduction

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, February 2018.

The Student Protection Plan was written in consultation with Student Government. The SPP covers all current students, prospective students, undergraduate and postgraduate degree seeking students, as well as non-degree visiting and study abroad students.

The University is unique in that we are the only university that currently awards both a US and UK degree. In the event of the University ceasing to exist, it is highly unlikely our students can find an equivalent institution in the UK, but we are exploring possibilities for this.

Additionally, it should be noted that similar to many higher education institutions, over the past several months, the University has been adversely affected by COVID-19. It has impacted the University’s student numbers in the short-term and medium term, particularly given the international profile of the student body. Additionally, coronavirus has already had financial impacts on the University and the way in which the University is able to deliver its courses in order to adhere to the current social distancing guidelines.

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 some 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

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 on the basis of economies of scope and economies of scale.

The RIASA programme in Leeds has successful enrolment and profitability. In the event of an institutional closure, we will assist students in transferring to similar programme 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.

Measures to mitigate risks

If the University is unable to continue offering a specific degree programme, the University take the following steps as outlined in the Quality Manual (**Appendix 1**):

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

For current students affected by the closure of a programme:

Whenever possible, the University will make arrangements 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 timeframes.

- A Major Meeting will be convened to discuss the implications;
- Students on Leave of Absence or Study Abroad will be notified by e-mail and provided with guidance;
- The relevant department and/or student advisor will provide individual guidance on options to all students affected.
- Students will be provided with individualised advice on any courses that they must take to complete the programme.
- 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.
- 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.

- 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.¹

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 different 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.

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.

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 possible 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 has been agreed.

If a student reasonably 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, as well as 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 on the basis of feedback and to ensure

¹ 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 a 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.

Measures to mitigate risks

Where 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 in order 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 MSCHE revoking its accreditation is regarded as low. The University has quality assurance processes and ongoing monitoring procedures in place 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 has to meet equivalent US requirements parallel but mutually reinforcing processes are in place to ensure both US and UK standards are met.

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 into 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 either its campuses in the short to medium term is low, with the exception of the University deciding to move to alternative premises.

The University is currently refining its Estates Strategy which includes the possibility of consolidating the majority of operations onto one campus or potentially moving to alternative premises later in the year at the earliest.

The risk of the University having to close the location of its RIASA programme is low due to the long-term contract with Leeds Beckett University.

Measures to mitigate risks

The University will identify suitable premises in London to mitigate the impact of the effectiveness of its programmes. Spaces identified would meet the University's requirement for quality and accessibility as well as being fit-for-purpose to ensure that the student experience is not compromised. A consultation will take place, involving key staff and a subset of students in helping to identify the key features of a potential new premise. The University has previously undertaken acquisition of additional space for the Business School near our Kensington campus which has been an effective solution.

Partial Closure

In the event of a partial closure with the majority of operations based on one campus, the University will enter commercial discussions with any relevant landlords to mitigate the residual cost to the University. Steps will be taken to minimise the impact on student experience in the event of a partial closure by ensuring that student services that are currently offered continue to be accessible on both sites.

Alternate Premises

To minimise disruption for students, in the event that the University decides to move to alternative premises, the University will ideally look to move during the Summer where there are fewer students on campus to minimise disruption to students and staff. Should it not be possible to move over the summer period, the University will look to relocate during term breaks. Students will be notified in advance of any proposed move and the University will provide assistance to affected students living on campus in the moving process.

Equality Impacts Assessment would be undertaken to ensure that the University was considering the needs of different groups of students. Should students have special circumstances that required reasonable adjustments, the University would consider these on a case-by-case basis and the University would 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.

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:

- Contact all current international students to provide individual advice on whether they will be permitted to remain at the University to complete their studies 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;
- Contact all prospective students to advise them of the suspension;
 - Provide support in securing a place at a different institution;

- Offer the student the opportunity to postpone an application to the University pending the resolution of the suspension;
- Provide support to students in transferring to another provider with Student Visa license;
- Work with UKVI to allow a student to complete the current year of study or programme;
- 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 to 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.

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:

- Offering the chance to move to another programme;
- Delivering a modified version of the same programme;
- Discuss the option of 'Teaching Out' existing students;
- Providing assistance to switch to a different provider who has the relevant accreditation.

7) The University as a whole is no longer able to operate

The risk of the University closure is medium to low. 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.

We will undertake equality impact assessments to assess the effect on students with different 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 different categories. The University uses this information to then plan and make adjustments depending on the specific needs. For example, students with low GPAs will be identified and advised on which courses they should consider retaking in order to increase their GPAs and improve their transfer applications and timeline to graduation. The difficulties encountered by the University in Spring 2020 mean that there is significant knowledge and expertise in preparing for cessation of operations.

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:

- 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;
 - The University will assess the alignment and mapping of programmes and assist students in case a change of majors if necessary;
 - For any students who do not wish to transfer to the new institution, the University will support them in applying to other institutions;
- 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;
 - The University will review the timeframe that cash flow would permit the University to remain in operation. It will then analyse their student body and make changes to the provision of courses whenever possible so that greatest number of students will be able to complete their studies;
- Where the above is not possible, the University will support transfer to an appropriate programme at another provider;
 - The University will identify and contact suitable providers for students to transfer their credits, subject to admissions criteria;
 - The University will organise “transfer fairs” to allow students to have the opportunity to speak to and choose a new provider;
 - 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;
 - Present all qualifying students for UK and/or US exit awards to the next University Examination Board and issue certificates;
 - Provide transcripts for all students demonstrating credits earned up until the point of closure;
 - Archive academic records to allow graduates students can access evidence of their academic achievement in perpetuity;
 - Create a data repository so that all alumni have access to their transcripts.

Communication Plan and Student Information Provision

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 in the event that we are no longer able to preserve continuation of study. In the event that 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 which 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 aforementioned 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 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.

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 open rate wherever possible. The content of the Communications Plan will include:

- Background to the situation and what is happening;
- List of contact points where students can get more information face-to-face;
- List locations / dates of and Student Information Meetings or Student Government Meetings;
- Assurance that they will be offering student support;
- Scripts for all student-facing staff;
- Comprehensive Q&A which will be used to support all student information will be published on the website and student portal;
- 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;
- 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.

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.

In the event that the reach of the messaging is not sufficient, Student Government will be instrumental in supporting messaging and ensuring students are provided sufficient opportunity to understand the circumstances and their options. The University also tracks the 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.

Student Support – Mental Health and Wellbeing

The University has a dedicated Student Health and Wellbeing Coordinator 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:

- Sporting / physical health activities during term time with the support of a Student Sports Assistant;
- Yoga, mindfulness and mediation through an external contractor;
- Personal counselling through our 5 London-based counsellors and 2 Leeds-based counsellors. All students qualify for 6 sessions per term for free. Booking is anonymous through emails to the counsellors. We are in the process of updating our booking system to an app that will allow students to see availability and book an appointment confidentially

The Student Health and Wellbeing Coordinator shares a case load of students with the Student Affairs team and the Case Manager in Registry Services. These are students who may be struggling with chronic illness, care responsibilities, financial problems, family issues, specific educational needs/disability or any combination of these. These cases are discussed at team meetings regularly to ensure the students have the properly level of support throughout their studies

Additionally, the Student Health and Wellbeing Coordinator 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 Coordinator also works with student groups, particularly those in the Richmond Psychology Association, to raise awareness about mental health concerns in young people.

The Coordinator is trained in 'Mental Health First Aid' and this year we aim to have other staff/faculty trained who have high levels of contact with students.

Estates Considerations to Ensure Continuity of Study for Students

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

As a result, the following actions are taken:

- Maintenance and upkeep on all leased properties for both teaching and accommodation purposes;
- Daily, on-site security for all campuses;
- Operation of 24-hour help desk;
- Operation of canteen services;
- Grounds maintenance;
- Responding to maintenance requests from students and staff;
- Project work born out of the findings from any external assessments.

Continuing these actions will mitigate any negative impact to students in the event that a risk materialises.

Coronavirus has impacted the way in which the University is currently able to deliver courses. Summer courses are currently being taught online. In the Fall, the University is currently considering a blended approach which involves smaller classes to ensure that social distancing can be adhered to combined with virtual learning. Alternatively, the University is considering a full online delivery for Fall should this be permitted by the UK and US regulators.

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.

Refunds and Compensation

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 both the SPP and 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.

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 so as to minimise disruption to students and to enable students to complete their studies as intended, however, after exploring all possible 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

- Students will need to submit their claims for consideration to the relevant Head of Department.
- Eligibility for refund and/or compensation, and the amounts to be awarded, will be considered by the Director of Finance.
- 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.
- In other cases, we 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.

Compensation and Refund considerations

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

- Scale and impact of the matters affecting students;

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

Eligibility for 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.

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, please get in contact with the programme leader and seek advice. Students choose to interrupt study or withdraw for a variety of reasons and the University may be able to help.

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 with regard to 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.

Complaints Procedure

In the event that 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.

Review of policy

This policy will be reviewed at least annually and update and amend as required. The University reserves the right to amend this policy from time to time based on legal or regulatory change affecting students or the University or to follow best practice in the higher education sector.

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 at least annually 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 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