

# Student Protection Plan

Applicable with effect from: March 2025

Provider's name: Bath Spa University

Provider's UKPRN: 10000571

Legal address: Newton Park, Newton St Loe, Bath, BA2 9BN, United Kingdom

If you have any queries about this Student Protection Plan, you can contact the nominated senior contact for the Plan, The Pro Vice-Chancellor (Academic Planning) on (01225 875875 or [vice-chancellor@bathspa.ac.uk](mailto:vice-chancellor@bathspa.ac.uk))

	Section	Content
1. About Our Student Protection Plan		
1.1	What is a Student Protection Plan?	<p>The University's core purpose is to provide high quality courses that inspire you and provide you with opportunities to achieve success in your studies and prepare you for rewarding careers.</p> <p>As a registered provider of higher education, we are required to develop and publish a Student Protection Plan as agreed with our regulator, the Office for Students. A Student Protection Plan (SPP) protects your interests when events materialise that pose a risk to you continuing</p>

	Section	Content
		<p>your studies. It describes how we manage those risks we can foresee and sets out in advance what you can expect from us as a regulated provider in the event we need to activate our Student Protection Plan to support you.</p> <p>In England, the higher education regulatory body is the Office for Students and they have approved this Student Protection Plan prior to us publishing it. Find out more about Student Protection Plans on the OfS website at <a href="https://www.officeforstudents.org.uk/">https://www.officeforstudents.org.uk/</a></p>
1.2	Who is covered by this Plan?	<p>If you are a current student on, or are holding an offer of admission to, any course delivered or provided by Bath Spa University, at any level, then you are covered by this Plan. This includes any students undertaking reassessment or on approved breaks in study for any reason.</p> <p>If you are a registered student of Bath Spa University, even if you are studying on a course awarded by Bath Spa University but delivered by a partner institution, you will be covered by this plan.</p> <p>Bath Spa University has a number of partners which deliver University programmes and courses, some of which are regulated by the Office for Students and will therefore have their own Student Protection Plans in place. If the partner provider that you are studying at is also registered with the Office for Students, then you may also be covered by their Plan. However, the University is committed to supporting all our partner institutions and all students registered on courses leading to a Bath Spa University award, even when taught by another provider. The University regularly monitors the performance of collaborative partners and, in the unlikely event of a partner being unable to meet its commitments, the University would put in place its own arrangements to enable continuation of study for students.</p>
1.3	Which principles and commitments underpin this Student Protection Plan?	<p>We will only activate our plan when necessary to protect your interest when there is a serious risk of disruption to your continuity of studies. We will do so in accordance with any guidance set out by the Office for Students. When we need to activate our SPP, we commit to the following four principles and commitments that will give shape to our response:</p>

	Section	Content
		<ol style="list-style-type: none"> <li>1. The student interest will be first and foremost in the University's considerations;</li> <li>2. The University will communicate with affected students in a timely manner;</li> <li>3. The University will promptly prepare a Student Protection Implementation Plan that is specifically designed to respond effectively to the scenario that emerges;</li> <li>4. You will be made aware of appropriate sources of advice and support.</li> </ol>
1.4	Which events might lead to the activation of this Plan?	<p>This Student Protection Plan seeks to cover a range of foreseeable financial, regulatory and other risks setting out what we will do in the event that these risks materialise. Each situation will be unique and considered carefully. The foreseeable risks might include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Challenges to the financial sustainability of the University;</li> <li>• The loss of the University's ability to award some or all of the awards it teaches;</li> <li>• The loss of the institution's licence to sponsor international students;</li> <li>• The closure of a campus or teaching site;</li> <li>• The failure of a partner institution or the ending of a partnership;</li> <li>• A course or courses become unviable.</li> </ul> <p>Our current Assessment of Risk to Continuity of Study for Students represented by these and other events is provided at <b>Annex 1</b>. Please note that whilst some risks may overlap with those covered by the University's Business Continuity and Emergency Management plans, they are distinct from the provisions set out in this plan.</p> <p>For the avoidance of doubt, this Student Protection Plan does not cover individual students where they are unable to continue their studies as a result of the University operating its approved policies and procedures (for example, for non-payment of tuition fee debt; or actions resulting from disciplinary or appeal processes).</p>

	Section	Content
1.5	How will we communicate and review our Student Protection Plan?	<p>Our Student Protection Plan is a public document, available to you via our website:  <a href="https://www.bathspa.ac.uk/about-us/governance/policies/">https://www.bathspa.ac.uk/about-us/governance/policies/</a>.</p> <p>We make sure that relevant University staff are aware of the Plan and are updated on its contents including any changes appropriately. Our plan is published and is available to all partners.</p> <p>This Plan is related to a range of foreseeable risks. As such, it is reviewed normally on an annual basis to ensure the provisions contained in the Plan remain appropriate to our assessment of the range of risks encountered and the likelihood these might materialise during the period covered by the Plan.</p> <p>The Plan is reviewed via the University Leadership Group, in consultation with the Students' Union and through the scrutiny of our Board of Governors. The provisions of this Plan also require that a lessons learned exercise is conducted whenever the Plan is required to be activated, with those lessons applied to the next review of the Plan.</p>
<b>2. What Happens When Our Plan is Activated?</b>		
2.1	The preparation of a Student Preparation Implementation Plan	<p>Our Student Protection Plan (SPP) provides an overarching framework for action and rests on a clear statement of principles and commitments which provide the basis for designing our response to any specific set of circumstances that require the activation of our SPP. Only the Vice-Chancellor, as the University's Chief Executive, can formally activate the Student Protection Plan.</p> <p>Once the plan has been activated, the University will consider whether the events being responded to require the development of a full Student Protection Implementation Plan, including consideration of the following steps as appropriate to the situation (note that this list</p>

	Section	Content
		<p>is not meant to be definitive):</p> <p>The Vice-Chancellor or their nominee will ensure the following actions are taken:</p> <ul style="list-style-type: none"> <li>• Ensure the creation and maintenance of a continuous formal log and record of all relevant events, information and decisions that culminated in the activation of the SPP and everything that happens under its auspices until the satisfactory conclusion of the event and the closure of the SPP.</li> <li>• Inform the Chair of the Board of Governors of the activation of the SPP.</li> <li>• Formally notify the Office for Students of the activation of the SPP and designate a single point of contact with the regulator throughout the operation of the Plan.</li> <li>• Appoint a senior member of staff to act as Senior Lead with delegated authority to design an event-specific Student Protection Implementation Plan (SPIP) that is appropriate in scale and scope to the situation and is consistent with the principles and commitments identified in section 1.3 above.</li> </ul> <p>The Senior Lead will then consider the following steps and options when forming a detailed Student Protection Implementation Plan. Where the activation of this plan concerns or relates to one of our educational partners, we will implement this plan to ensure all eventualities are covered, but we will also liaise where possible with the relevant partner to establish what student protection planning they have in place, their plans for implementation, and how we can ensure that these plans align to support the best interests of students. This list is not intended to be exhaustive:</p> <ul style="list-style-type: none"> <li>• The assembly of a response team which contains the appropriate skills and authority to act promptly to meet the University's obligations to its students effectively. It is a requirement that student representation is normally included in this response team.</li> <li>• The development of an appropriately detailed communications plan that informs students, applicants and any other parties of the events and the University's commitments under this Plan and likely next steps and timescales.</li> <li>• The maintenance of a formal log of activity and decisions made throughout the life of the SPIP.</li> </ul>

	Section	Content
		<ul style="list-style-type: none"> <li>• The team developing the SPIP will consider a range of options to protect student interests. Examples might include: full teach out of existing course at existing location; transfer to another related BSU course at the same or different location; transfer to another partner or provider offering an alternative suitable course; offer of refunds and/or compensation.</li> <li>• Once the SPIP has identified the viable options available to applicants and students under this Plan, the Senior Lead and Students' Union may jointly undertake an Equality Impact Assessment of the proposed arrangements, where appropriate, to ensure as far as possible that arrangements are consistent with our commitments to equality of opportunity.</li> <li>• The viable options available will be presented to applicants and students for their consideration alongside a package of information, advice and guidance and support contacts to provide as much student choice as is possible.</li> </ul> <p>The closing of a Student Protection Implementation Plan:</p> <ul style="list-style-type: none"> <li>• The Senior Lead will advise the Vice-Chancellor when the commitments covered by this Student Protection Plan have been implemented by the SPIP and that the deactivation of the Student Protection Plan is appropriate.</li> <li>• Following the deactivation of the Student Protection Plan, the University will undertake a 'lessons learned' exercise to understand the effectiveness of the University's response and to ensure this experience informs the next scheduled review of this Student Protection Plan.</li> </ul>
<b>3. Student Refunds and Compensation Policy</b>		
3.1	How are student refunds and compensation managed?	The University's policy on refunds and compensation is set out within the University's <a href="#">Terms and Conditions</a> , and the University's financial policies, procedures and regulations.

	Section	Content
4. Managing Risk		
4.1	Measures we use to mitigate against risk	<p>All Bath Spa University courses undertake an annual process of Programme Review, which is informed by review of key student and course performance data. This process identifies programme areas most at risk of closure or regulatory non-compliance; and operates a two-tiered intervention and action planning process to address any emerging risks. In circumstances where we identify that core changes may have to be made to best protect students or to improve their academic experience the University will consult with, and in some cases seek the consent of, students in alignment with the Modifications Process to address any concerns.</p> <p>The University operates an established approach to risk management underpinned by an embedded risk management framework. The University's Strategic Risk Register is updated regularly in line with the risk and assurance review cycle and the governance cycle, and reflects the University's assessment of key strategic risks, as well as identifying important risk mitigations and controls in place to help the University to mitigate the impact of risk on strategic activity. The Strategic Risk Register has executive oversight via assigned ownership of risks by the leadership team and is aligned with the University's Risk Appetite Statement. Risks are formally reviewed periodically throughout the year by the University Leadership Group and by the Audit and Risk Assurance Committee of the Board of Governors, which has structured discussions and challenge on focused areas. The Board of Governors also reviews the Strategic Risk Register on a scheduled basis.</p>
Annex 1: The University's Assessment of Risks to the Continuation of Study		
	Why do we have a risk assessment?	To support the University in delivering this Plan, we have completed a risk assessment to help us identify what are the possible risks to continuation of study. A risk assessment enables us to determine the scale of each risk, how the University plans to prevent risk impacting on students, and also helps us to identify any specific actions we need to mitigate risk. Identifying

	Section	Content	
		risks and planning to manage them in this way helps us to reduce the likelihood of issues impacting on students and their studies.	
No.	Risk identified	Commentary	Assessment
1	If the University is unable to create, manage and maintain a financially sustainable business model, the viability of the institution may be threatened	<p>As a registered provider of higher education, the University is subject to Ongoing Condition of Registration D: Financial Viability and Sustainability. This means the Office for Students uses its regulatory powers to satisfy itself that any provider is financially viable, has the necessary resources to provide both for the courses it has advertised and to comply with all the other Ongoing Conditions of Registration.</p> <p>As an institution, we have robust and ongoing monitoring, assessment and review of our financial position, including the prudent management and availability of our financial reserves. We must satisfy external auditors annually that our financial statements mean we are a 'going concern'.</p>	Our financial position and satisfying the oversight of this key aspect of us as a regulated business means the risk to students here is <b>low</b>
2	If the University loses its ability to make some or all of the awards it teaches the viability of academic operations may be threatened	<p>The University is an established provider of higher education registered with the Office for Students, and has mature systems of governance, monitoring and oversight in place in accordance with the Conditions of Registration to ensure our provision exceeds the required expectations and thresholds for our awards.</p> <p>The University continually monitors its compliance with the regulatory requirements of the Office for Students through regular reports to the Board of Governors, including reports on the operation of quality and standards processes, and academic governance arrangements; and the effectiveness</p>	Our academic management and performance mean the risk to students here is <b>very low</b>



	Section	Content	
		of these in meeting the B Conditions which relate to way we maintain standards in management of awards.	
3	If there is a temporary closure of a teaching site, the University's capacity to deliver high quality teaching may be affected	<p>Like any business, it is possible that due to fire, flood or other disaster situations, a teaching site may be closed unexpectedly or at short notice, impacting students.</p> <p>The University maintains its Estate to a very high standard which minimises the likelihood of such events occurring.</p> <p>However, the possibility of such events always remains so the University maintains an Emergency Management Plan and a Business Continuity Plan which gives the University an advance measure of preparation so that we can return to normal service levels as soon as possible.</p>	Unforeseen events are always a possibility, but the University is well prepared, just in case - the risk to students is <b>very low</b>
4	If there is a permanent closure of a teaching site, the University's capacity to deliver high quality teaching may be affected	In the event that a disaster/emergency event means a teaching site cannot be returned to use, the University's Business Continuity Plan would seek alternative arrangements for the delivery of affected courses and student continuity as a matter of priority. Continuity of study would likely be maintained most immediately through use of different sites and/or remote teaching. Students impacted by the events would be consulted in the formation of longer term alternative arrangements for the continuation of their studies.	The risk to students is considered <b>very low</b>

	Section	Content	
5	If the University loses its licence to sponsor and teach international students, the student experience and financial sustainability may be threatened	<p>The University holds and operates a licence to sponsor international students subject to the arrangements and requirements set out by the Home Office.</p> <p>To remain on the <a href="#">Register of Student Sponsors</a>, on which we hold the higher 'track record' status, we must satisfy all requirements set out by the Home Office, which includes passing an annual assessment carried out by the UKVI, called a Basic Compliance Assessment. Our position against the UKVI's Basic Compliance Assessment core requirements are reported to the University Leadership Group on a quarterly basis and annually to the Board of Governors.</p> <p>The University also asks its internal auditors to review our arrangements in this area from time to time to ensure our provisions here remain adequate to the changing policy environment.</p> <p>In the unlikely event we were unable to maintain our licence, we would work with UKVI and our students to identify the most appropriate solution, for example the transfer of students to a different provider where possible. If this were not possible, we would consider refunding students according to our Terms and Conditions (see section 3, above).</p>	The risk to students is considered <b>low</b>
6	The failure of an educational partner institution or the ending of a partnership may impact on our capacity to deliver financial sustainability and high-quality	It is not possible to give a single risk rating which applies uniformly across the whole of the University's partnership portfolio. Risk levels range from <b>low</b> to <b>high</b> depending on a number of different factors and circumstances for each individual partnership.	The risk to students is <b>varied</b> – see Content column for more information

	Section	Content
	teaching, as well as cause disruption to the wider student experience	<p>The University values highly the work it does through educational partnerships, bringing the benefits of higher education to and expanding opportunities for different sections of the population. Many educational partner institutions may be better placed to offer local and flexible learning experiences attractive to students.</p> <p>We undertake extensive financial, legal and academic due diligence on all our potential partners before we approve any new partnership. This process itself is designed to minimise at the outset the risks of a partnership ending prematurely or the partner failing to deliver our courses to you.</p> <p>However, partners come in all shapes and sizes, with different histories and structures as diverse as the number of providers in the market. Smaller, independent providers might offer something very distinctive, but their size might also mean that they are less able to handle rapid changes in market conditions or sudden changes in government policy. This could lead to instability and heightened risk to the continuity of study. We work with all our partners to smooth out these flows to promote stability and to foresee and mitigate any difficulties that might be arise.</p> <p>We recognise that the nature of partnership working, especially given the differences between providers, and the challenges faced by smaller providers noted above, carries a degree of risk. Bath Spa is a creative and innovation-led University with an institutional appetite to take risk where this means we can provide our students with a better experience. Working with educational partners means that Bath Spa can</p>

	Section	Content
		<p>offer students more choice in their studies – choice of subject, location and ways of studying: we believe this is a very good thing for our students and for the University as a whole. However, we acknowledge that in some instances there may be a higher level of risk which comes with this kind of partnership working.</p> <p>If it becomes necessary to intervene (for financial, academic or other reasons) we will work with our partners to protect the interests of students and with the priority being to secure as much continuity for them as possible. The University will ensure that our educational partnerships which offer franchised courses on its behalf have Student Protection Plans of their own where appropriate (as this is required for all partners registered with the Office for Students in their own right), and work with them to ensure that any interventions we need to take are effectively aligned.</p> <p>We will monitor the risks that an educational partner will be unable to continue teaching students to ensure that any risks identified are mitigated in order to protect the student experience. Risks like this are covered in the contract between the educational partner and the institution, so that if the educational partner is not able to teach out a course that has to close, the University will where possible teach the course directly, and where this is not possible seek alternative providers for students. We will try to provide students with options which enable them to transfer to alternative courses, either within Bath Spa or with other providers, so that student choice remains protected. Were none of the above to be possible or practical, we would explore whether refunds and compensation can be made to</p>

	Section	Content	
		<p>students in line with our Terms and Conditions (see section 3, above).</p> <p>As noted elsewhere in this Plan, we have a communications strategy in place to ensure students and applicants are fully updated on any interventions required and the likely impact on their studies, in the event of a partnership ending. In such an instance the University will work with the educational partner to ensure their communications provide accurate and timely information, advice and guidance to affected students. Where the educational partner is not able to provide this information directly, the University will manage the communication process. This means that any decisions we take on what to do (including the options above) will be clearly communicated to students as soon as possible. We will engage actively in our communications with students to ensure information is clear and that support and advice is available.</p>	
7	If the University decides to close a course for business reasons student performance and wellbeing may be negatively impacted	<p>From time to time the University does discontinue courses as demand for them changes. When this happens, the University may determine that the course should not continue to recruit students.</p> <p>The University would not normally close courses with immediate effect. Rather, a course would be closed to new entrants and existing students would be supported to continue their studies, progressing as normal until the final cohort has completed their programme. The University</p>	The risk to students here is <b>low</b>

	Section	Content	
		<p>would normally 'teach out' such programmes in the same location, to the same specification and same commitment to resources and student experience as before.</p> <p>A decision to close a course on business grounds should not therefore adversely impact any existing students. In such cases a formal discontinuation plan is drawn up to ensure a plan is in place, allowing all students to complete their course, including those who might have or subsequently have appropriate mitigating circumstances affecting their continuation.</p> <p>Any applicants to a course affected by such a decision would be notified as soon as practicable and offered an appropriate alternative course or courses.</p>	
8	If a course or courses are relocated from one campus to another there may be disruption to the student experience	Like all Universities we develop our estate through time in order to provide the best possible facilities for students. Sometimes this may involve relocating the delivery of courses. Typically, estate development takes a number of years and the communication of such proposed changes will be given at the earliest possible time to affected current and prospective students, and we would work to minimise any disruption. Any new buildings or facilities would be compatible with their intended use as identified at planning stage.	The risk to students is <b>low</b>
9	If the University is unable to deliver key material components of one or more courses there may be disruption to the student experience.	The University updates and reviews its curriculum regularly to ensure that courses remain up to date, meet regulatory requirements and take into account feedback from staff, students and external examiners. If core modules on a programme cannot be delivered due to unavoidable	The risk to students is <b>low</b>

	Section	Content	
		<p>disruptions to our capacity to deliver key material components (for example, due to nationally-led industrial action or force majeure events outside the University's direct control) then alternative solutions are sought; for example, rescheduling to a different semester or making alternative staffing or delivery arrangements. Where programme re-design or modification proposals include the replacement of core modules, affected students are consulted. Course design and review, as well as business planning processes ensure that there is sufficient staffing in place to deliver core modules.</p> <p>Our Terms and Conditions outline cancellation rights for students in the instance of programme change – see link in Section 3.1 above.</p>	
10	If there is a loss of service due to IT failure or cyber-attack preventing delivery of course material the University's operations may be negatively impacted	<p>This risk is increasing given the global rise in instances of cyber-attack and has the potential to result in the loss of our core teaching, assessment, information and records systems.</p> <p>The University has prepared for this growing threat by undergoing assessment for the UK government's <a href="#">Cybersecurity Essentials Plus</a> accreditation, which was awarded in late 2021 and which requires us to maintain a very high standard of cyber-security.</p> <p>Although this provides a high degree of assurance, the world of cyber security changes quickly so this must be perceived as a continual threat and one that requires constant vigilance and preparedness. All University staff are required to undertake mandatory Information Security awareness</p>	The risk to students is <b>medium</b>

	Section	Content	
		<p>training to minimise the possibilities for inadvertent access to our systems that could lead to data loss or unauthorised access.</p> <p>This is a significant strategic risk for the University and is being managed accordingly. However, given the mitigations we have in place and ongoing activity in this area to manage both the likelihood and impact of a cyber event, the direct impact on students and continuation of study is anticipated to be less severe than in other areas (e.g. impact on operational activity).</p>	
12	If there is a loss of Professional Accreditations applicable to particular courses this may impact delivery	<p>This risk is considered low. The University has institutional oversight of its accreditation with Professional, Statutory and Regulatory Bodies through a PSRB Management Policy and a central PSRB register which is kept under review and includes outcomes and actions following accreditation visits. Re-accreditation exercises are owned by Schools and overseen by senior management.</p> <p>Programme Modification processes require explicit confirmation that accreditation requirements continue to be met.</p>	The risk to students is <b>low</b>