

## Document

Document Name	Student Protection Plan
Responsible Owner	Navitas UPE Operations Team
Issue Date	September 2023
Brief Description of Policy	Student Protection Plan sets out the measures that Navitas University Partnerships Europe (UPE) have in place to protect the students in the event that a risk to the continuation of their studies at one the Navitas UPE Colleges should arise.

## Version Control

Date	Version	Summary of changes	Approver
February 2020	2020/01	<ul style="list-style-type: none"> <li>Initial policy version</li> </ul>	Navitas Governing Body
September 2021	2021/01	<ul style="list-style-type: none"> <li>New template used</li> <li>New Colleges and University partnerships added</li> </ul>	Navitas Governing Body
October 2022	22_01	<ul style="list-style-type: none"> <li>Keele University International College (KUIC) and Keele University added</li> <li>New table of College and University links added (websites and SPP plans)</li> </ul>	Navitas Governing Body
September 2023	23_01	<ul style="list-style-type: none"> <li>New policy template and formatting changes</li> <li>Risk Levels added to events/material changes</li> </ul>	Navitas Governing Body

## Key Related Documents

Name	Location
NPR QS16 Compensation and Refund Policy	<a href="https://upic.navitas.com/about/policies/">https://upic.navitas.com/about/policies/</a>
NPT QS17 Student Transfer Policy	<a href="https://upic.navitas.com/about/policies/">https://upic.navitas.com/about/policies/</a>

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## Background and Introduction

Navitas University Partnerships Europe (UPE) is a specialist provider of University Pathways education. We have a global reputation for transforming students' lives by providing access to higher education to students from all backgrounds and from across the globe. Navitas UPE operates a number of higher education institutions across England, Scotland, Wales (our **Colleges**) in partnership with established UK Universities (**University Partners**).

Our pedagogic approach offers small classes, a high number of contact hours, a dedicated and proactive support infrastructure and robust attendance monitoring to ensure that you are supported throughout your pathway programme of study.

## Our Programmes of Study

Our programmes of study fall into four broad areas. These include:

- **Level 3 Foundation Programme** for students who have marginally missed their university entry qualifications or whose English language skills fall slightly below the standard entry requirement
- A Level 4 **First Year** for students who would benefit from additional academic support to succeed in their studies
- A **Pre-Master's Programme** for students who are changing discipline, or would benefit from additional preparation for the rigours of postgraduate study
- A **Pre-Sessional Academic English Programme** for students who need to improve their English language skills before commencing their chosen Foundation, Undergraduate or Postgraduate programme

Navitas UPE Colleges offer integrated education programs, allowing students to attain Undergraduate or Postgraduate Degree qualifications while completing their academic journeys at the University Partner.

## Our Plan

This Student Protection Plan sets out the measures that Navitas UPE have in place to protect you, the student, in the event that a risk to the continuation of your studies at one of our Navitas UPE Colleges should arise.

This Student Protection Plan covers your period of study with the College at a level described above (Foundation, First year, Pre-Master's or Pre-Sessional English).

Once you have completed the level(s) of study with the College and have progressed to the University Partner to complete your full/onward programme, you will come under the Student Protection Plan of the University Partner (links to University Partner Plans can be found in Annex A at the end of this document).

Navitas UPE is committed to ensuring that it maintains a strong financial base and the infrastructure and staffing required to enable students enrolled in its Colleges to complete their studies. Where changes to resourcing or programmes on offer are planned, the priority will be to protect students' interests and ensure that any changes are introduced in such a way as to enable students to complete

their programmes which meets their expectations.

Risks that students may be prevented from completing their programmes for reasons of programme closure or the College’s inability to deliver the programme are considered to be **low**.

Our commitments to you, description of the issues, risk assessment and mitigating measures are set out below.

## Our Commitments to You

We commit to:

- Being open and transparent with you should any risk to the continuity of your programme of studies arise, and inform you in a timely manner
- Taking reasonable steps to protect your studies should your programme be stopped
- Consult with you and take into account your views in a timely manner before deciding to implement any substantial changes to your programme, discontinuing it, or closing a Navitas UPE College
- Taking into consideration the needs of all our students and the impact on your fellow students of any proposed changes and protective measures
- Informing the Office for Students of any changes that may necessitate a review of this Student Protection Plan or any measures contained within it

## Type of Issues are Covered by the Student Protection Plan

Below are some examples of the types of events which could cause the Plan to be triggered, and some examples of events that would not.

Covered (Material Changes)	Not Covered
<p><i>If the College:</i></p> <ul style="list-style-type: none"> <li>✓ Stops your specific programme</li> <li>✓ Closes the location (Navitas UPE College) on which the programme is taught</li> <li>✓ Can no longer provide the programme to you for any other reason, for example:               <ul style="list-style-type: none"> <li>○ We (the College) cease operating through no choice of our own</li> <li>○ We (the College) lose the right to provide the programme or qualification (external accreditation)</li> <li>○ The University Partner loses its Student visa Sponsor Licence which allows both the College and University to recruit and register international students</li> </ul> </li> </ul>	<p><i>If the College:</i></p> <ul style="list-style-type: none"> <li>✗ Makes minor adjustments and improvements to a programme (this could include no longer accepting new students on a particular version of the programme)</li> <li>✗ Makes minor adjustments to module content</li> <li>✗ Makes changes to your timetable, including rooms, buildings or on-campus locations</li> </ul>

<ul style="list-style-type: none"> <li>○ You face short-term disruption to your programme through staff illness; industrial action; or minor structural damage rendering teaching facilities temporarily unavailable</li> <li>○ You face long-term disruption to your programme that continuously and materially affects your programme teaching over many months (e.g., fire in a key building leaving it unstable)</li> <li>○ We (the College) work with a partner to deliver your programme and they are unable to continue, or decide to stop, delivering that programme</li> <li>○ The University Partner closes or reorganises the School or Department to which your programme belongs and, therefore, there is not the required subject knowledge available to continue teaching your programme</li> </ul>	
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### Assessment of the Overall Risk

It is important to note that whilst Navitas UPE and each College will plan for a wide range of scenarios, many of these are very unlikely to happen. Navitas UPE is an established global education provider with a proven record of providing good academic outcomes for our students. We operate under a well-constituted governance structure with a strong financial base.

The Navitas UK Holdings Governing Body, under an independent Chair, oversees any actions relating to the Office for Students, including this Student Protection Plan. As such, we are able to support and fund the proposals in this Plan should the need occur.

We maintain a Risk Register which records and reviews any potential events which could trigger this Plan. Should the likelihood of one of these trigger points increase, there are lines of communication and processes to escalate risks through the Joint Strategic Partnership Management structures with our University Partners to ensure that interventions to mitigate them takes place. Navitas UPE and our University Partners assess that the risk of the occurrence of the material changes listed above to be low because of a mix of financial stability and robust business planning.

### Action in the Event of a Material Change (Triggering the Student Protection Plan)

1. If we cease delivering a programme	Risk Level considered 'Low'
Context	What we will do
Navitas UPE Colleges offer pathways into Undergraduate and Post Graduate programmes awarded by our University Partners. From time to time, our University Partners will review the portfolio of programmes that they offer and may temporarily suspend or permanently withdraw a programme. When considering whether or	For those students already enrolled on the programme and studying with the College we will, whenever possible, facilitate you to complete your studies. We refer to this as 'teaching out'. In such circumstances, we will carefully manage our approach to staffing and other resources to ensure your studies are affected as little as possible. Where it is not

<p>not to suspend or permanently withdraw a programme, the University Partner will consider what impact the decision will have on students already on the programme, and those who have made an application to study on the programme but have yet to enrol.</p>	<p>possible to teach out, we will consider whether there are options for you to change programmes at the College, or to transfer to another Navitas College (and University Partner) which offers the same or a very similar programme, to enable you to complete your studies in your chosen degree.</p> <p>Where appropriate, we will consider financially compensating you where you suffer demonstrable, material financial loss because of the suspension or permanent withdrawal of your programme of studies under our <b>Compensation and Refund Policy (QS16)</b>.</p>
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2. If the programme you are enrolled on loses its accreditation	Risk Level considered 'Low'
Context	What we will do
<p>If your programme loses its accreditation from a professional, statutory or regulatory body, we will consider measures to protect your student experience.</p>	<p>This includes:</p> <ul style="list-style-type: none"> <li>• Offering you the chance to move to another programme</li> <li>• Delivering a modified version of the same programme</li> <li>• Providing assistance for you to switch to another Navitas UPE College whose University Partner has the relevant accreditation</li> <li>• Where the above is not possible, we would support your transfer to an appropriate programme (possibly at another provider, see <b>Student Transfer Policy QS17</b>) and, where appropriate, financially compensate you where you suffer demonstrable, material financial loss because of disruption to your studies under our <b>Compensation and Refund Policy (QS16)</b>.</li> </ul>

3. Disruption to College activity	Risk Level considered 'Low'
Context	What we will do
<p>There are a number of events which could cause disruption to the day-to-day functioning of the College, for example, loss of key teaching staff, industrial action, staff illness, fire/flood, etc.</p> <p>Where there is disruption to programme delivery, we will normally consider whether it is practicable to make changes to delivery, rather</p>	<p>The actions we will take to minimise disruption may include:</p> <ul style="list-style-type: none"> <li>• Temporary short-term suspension of programme delivery (e.g., where there is a change in the programme delivery location or staffing, with appropriate actions to mitigate the impact on you)</li> </ul>

<p>than closing or suspending the affected programme.</p> <p>For students studying on a Sponsor visa, we will take into account the adverse effect that any disruption to teaching might have in enabling you to complete your programme within the timeframe stipulated by the UKVI.</p>	<ul style="list-style-type: none"> <li>• Making alternative timetable arrangements to replace any scheduled teaching that is missed</li> <li>• Changing the delivery location or method, which may include distance learning, providing this is in line with the UKVI regulations</li> <li>• Changing the staffing of a programme, including the recruitment of alternative staff, where appropriate</li> <li>• Considering amendments to the assessment process to take into account any disruption while not disadvantaging students and maintaining academic integrity</li> <li>• Offering you the opportunity to transfer to an alternative programme</li> <li>• Providing reasonable support to you to access a programme run by another Navitas UPE College, or another provider, including making arrangements for the transfer of your credits and information about your academic progress</li> </ul> <p>In any of the above scenarios we will consider, where appropriate, financially compensating you where you suffer demonstrable, material financial loss because of disruption to your studies under our <b>Compensation and Refund Policy (QS16)</b>.</p>
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<p><b>4. If the University's Sponsor Licence is suspended or revoked</b></p>	<p><b>Risk Level considered 'Low'</b></p>
<p><b>Context</b></p>	<p><b>What we will do</b></p>
<p>The risk that the College will no longer be able to recruit and teach overseas students due to the loss or suspension of the University Partner's Sponsor Licence is deemed to be <b>highly unlikely</b>. Navitas UPE Colleges and their University Partners have robust procedures in place to ensure compliance with immigration legislation, covering admissions and procedures for current students. If the University Partner Student Visa Sponsor Licence is suspended, the College will take all reasonable steps to minimise disruption to you.</p>	<p>We will:</p> <ul style="list-style-type: none"> <li>• Work with UKVI to allow you to complete your year of study or programme</li> <li>• Allow you to enrol and commence your studies, if you are already in receipt of a visa based upon an allocated CAS from the University</li> <li>• Offer you the opportunity to postpone your application pending the resolution of the suspension (if you have not already commenced your travel to the College/University)</li> <li>• Where the above is not possible, we would support you to transfer to an appropriate programme at another</li> </ul>

	<p>Navitas UPE College, or another provider and, where appropriate, financially compensate you where you suffer demonstrable, material financial loss because of disruption to your studies, under our <b>Compensation and Refund Policy (QS16)</b>.</p> <p>If the University Sponsor Status is revoked, we will take all reasonable steps to minimise disruption to you by, for example, assisting you to switch to an alternative sponsor.</p>
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5. If part or all of the College teaching space (or other study location) closes	Risk Level considered 'Low'
Context	What we will do
<p>The risk that students will be unable to complete their programme due to closure of individual buildings is <b>highly unlikely</b>. Where we have to close part or all of the allocated teaching space, or if it becomes unusable for student activity we would typically consider a number of remedies.</p>	<p>These include:</p> <ul style="list-style-type: none"> <li>• Relocating provision to an alternative suitable location, subject to successfully adding a teaching site on the University Student Visa Sponsor License. This may include hiring spaces for programme delivery</li> <li>• Revising the timetable to allow all of the schedules of teaching to take place in the available facilities. This may involve student contact sessions delivered outside of normal office hours. Where we take this approach, we will consult with you and undertake equality impact statements to assess the effect on students with different needs, characteristics and circumstances</li> <li>• Where the above are not possible, we would support you to transfer to an appropriate programme at another Navitas UPE College (and University Partner), or another provider.</li> </ul> <p>In any of the above scenarios we will consider, where appropriate, financially compensating you where you suffer demonstrable, material financial loss because of disruption to your studies under our <b>Compensation and Refund Policy (QS16)</b>.</p>

6. If the College ceases operating	Risk Level considered 'Low'
Context	What we will do
<p>There are a number of possible scenarios which could result in a Navitas UPE College</p>	<p>These include:</p>



<p>ceasing operations, for example, failure to comply with contractual obligations with the University Partner, strategic decisions of the University partner, failure to meet regulatory obligations, etc. Any likelihood of this occurring is identified and carefully managed through Navitas UPE risk management procedures. Where we have no option other than to cease operating, we would consider measures to protect your student experience.</p>	<ul style="list-style-type: none"> <li>• Where possible, closing in a gradual way, over a period that would allow you to complete your studies at the College/University Partner</li> <li>• Where the above is not possible, supporting you to transfer to an appropriate programme at another Navitas UPE College (and University Partner), or another provider (see <b>Student Transfer Policy QS17</b>).</li> </ul> <p>In each of the events described above, the College/University Partner will endeavour to apply appropriate mitigation to enable you to continue your studies. In the unlikely event that under any of the above scenarios, or for any other reason caused by our omission or fault, you are unable reasonably to continue your studies then our <b>Compensation and Refund Policy (QS16)</b> will apply. The likelihood of any of these events happening is constantly monitored by Navitas UPE as part of its approach to risk management.</p>
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## Advice and Guidance

We will publicise our Student Protection Plan to current and future students by making the plan available on our websites and referencing it appropriately in our communications with students during the recruitment and admissions process.

We will review the Plan annually and will regularly seek views on this Plan from the student body as part of our student engagement processes.

We will inform students of any material changes which may affect their studies in a timely manner. Should the Student Protection Plan need to be triggered, you will be notified by the College Director/Principal or a member of the Academic and Student Services team via email. We commit to giving you the maximum amount of notice of any changes.

**We appreciate that the information in the Student Protection Plan is quite complex and detailed. If you have any questions about this plan and how it may affect you, please contact [upe.info@navitas.com](mailto:upe.info@navitas.com)**

## Policy Review

This policy will be reviewed every year unless there are internal or legislative changes that necessitate an earlier review.

## Appendix A - University Partnerships

Navitas UPE currently operates in partnership with the following English Universities with each University Partner maintaining their own Student Protection Plan, as a condition of OfS Registration.

University Partner	Navitas UPE College
<b>Anglia Ruskin University</b> <a href="http://www.anglia.ac.uk">www.anglia.ac.uk</a>  Student Protection Plan link <a href="#">here</a>	<b>Anglia Ruskin University College (ARUC)</b> <a href="http://www.arucollege.com">www.arucollege.com</a>
<b>Brunel University London</b> <a href="http://www.brunel.ac.uk">www.brunel.ac.uk</a>  Student Protection Plan link <a href="#">here</a>	<b>Brunel Pathway College (BPC)</b> <a href="https://pathway.brunel.ac.uk/">https://pathway.brunel.ac.uk/</a>
<b>Birmingham City University</b> <a href="http://www.bcu.ac.uk">www.bcu.ac.uk</a>  Student Protection Plan link <a href="#">here</a>	<b>Birmingham City University International College (BCUIC)</b> <a href="http://www.bcuic.navitas.com">www.bcuic.navitas.com</a>
<b>The University of Hertfordshire</b> <a href="http://www.herts.ac.uk">www.herts.ac.uk</a>  Student Protection Plan link <a href="#">here</a>	<b>Hertfordshire International College (HIC)</b> <a href="http://www.hic.navitas.com">www.hic.navitas.com</a>
<b>The University of Northampton</b> <a href="http://www.northampton.ac.uk">www.northampton.ac.uk</a>  Student Protection Plan link <a href="#">here</a>	<b>University of Northampton International College (UNIC)</b> <a href="http://www.unic.navitas.com">www.unic.navitas.com</a>
<b>The University of Plymouth</b> <a href="http://www.plymouth.ac.uk">www.plymouth.ac.uk</a>  Student Protection Plan link <a href="#">here</a>	<b>University of Plymouth International College (UPIC)</b> <a href="http://www.upic.navitas.com">www.upic.navitas.com</a>
<b>The University of Portsmouth</b> <a href="http://www.port.ac.uk">www.port.ac.uk</a>  Student Protection Plan link <a href="#">here</a>	<b>International College Portsmouth (ICP)</b> <a href="http://www.icp.navitas.com">www.icp.navitas.com</a>
<b>The University of Leicester</b> <a href="http://www.le.ac.uk">www.le.ac.uk</a>  Student Protection Plan link <a href="#">here</a>	<b>University of Leicester Global Study Centre (LGSC)</b> <a href="http://www.leicestergsc.com">www.leicestergsc.com</a>
<b>University Academy 92</b> <a href="http://www.ua92.ac.uk">www.ua92.ac.uk</a>  Student Protection Plan link <a href="#">here</a>	<b>University Academy 92 Global (UA92 Global)</b> <a href="http://global.ua92.ac.uk">global.ua92.ac.uk</a>
<b>Keele University</b> <a href="http://www.keele.ac.uk">www.keele.ac.uk</a>  Student Protection Plan link <a href="#">here</a>	<b>Keele University International College (KUIC)</b> <a href="http://kuic.keele.ac.uk">kuic.keele.ac.uk</a>