BPP University

Student Protection Plan 2026/27

Provider's name: BPP University Limited

Provider's UKPRN: 10031982

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1. An assessment of the range of risks to the continuation of student for your students, how those risks may differ based on your student's needs, characteristics and circumstances, and the likelihood that those risks will crystallise.

BPP University (the University from hereon in) has assessed the range of risks to students' continuation of study and these are summarised below:

1.1. Closure of the University

The University has no intention of ceasing to operate. The risk that the University as a whole is unable to operate is considered **very low**. This is evidenced by the following:

- The University is financially sustainable and continues to be a going concern as demonstrated by its most recent audited financial statements;
- The University forms part of the BPP Education Group (incorporated as BPP Holdings Ltd). Cashflow actuals and forecasts are monitored on a daily basis by BPP Education Group's central treasury function.
- BPP Holdings has sufficient Employers' Liability insurance, Public Liability insurance and Professional Indemnity insurance;
- The University Board of Directors meets at least termly and monitors financial performance and key risks to ensure the University remains financially sustainable and able to service the student population.
- The Audit Committee comprises three non-executive directors of the University Board of Directors. It meets twice a year to exercise scrutiny and oversight of financial health, internal control, whistleblowing and fraud, and external audit. It also meets twice per year to review internal audit.

1.2. Loss of Taught Degree-Awarding Powers

We consider the likelihood of losing degree-awarding powers to be **very low.** In August 2020, the Office for Students (OfS) signed an Order, which, from 1st September 2020 removed the time limits on the University's power to award degrees. The University has been through significant scrutiny that confirms we meet the overarching criterion and we are a self-critical, cohesive academic community with a proven commitment to the assurance of standards, supported by effective quality systems worthy of indefinite Taught Degree Awarding Powers (TDAPs).

1.3. Withdrawal of Registration

We consider the likelihood of withdrawal of registration as **very low**. The University has registration and continues to meet the requirements of annual monitoring, as confirmed by the OfS and Department for Education (DfE). The University is financially sustainable; complies with the requirements of Student Loans Company (SLC) funding; subscribes to the Office of the Independent Adjudicator (OIA) and complies with their expectations; complies with Alternative Provider Student Record and Graduate Outcomes (HESA) reporting; participates in the National Student Survey (NSS); makes submissions to Unistats and is compliant with the Prevent Duty. The University was successfully registered with the OfS on 15th October 2018 with no specific conditions. The University was awarded permanent Taught Degree Awarding Powers from the OfS in August 2020 following a review conducted by the Designated Quality Body (DQB). This confirms that the University meets the overarching criterion and has a self-critical, cohesive academic community with a proven commitment to the assurance of standards, supported by effective quality systems.

1.4. Suspension or Revocation of Student Visa

We consider the risk of not being able to recruit international students as **very low** for the following reasons:

- The University holds a valid and current Student Sponsor Licence with the UKVI;
- Every May, the University submits the Basic Compliance Assessment with the UKVI;
- The University takes its Student Sponsor Licence duties very seriously by monitoring the metrics and ensuring compliance in all three categories (refusal rate, nonenrolment, and course completion);
- Student Visa Sponsor compliance is reviewed by the University Board of Directors at each of its meetings;
- The UKVI has successfully passed all UKVI audits in the past 10 years;
- We use credibility interviews for applicants from high risk regions. In these interviews we assess applicants' genuine reason for studying in the UK prior to issuance of a Confirmation of Acceptance to Study (CAS) letter.

1.5. Loss of Accreditation from a Professional, Statutory or Regulatory Body (PSRB)

We consider the risk of non-continuation of study due to a loss of accreditation by a PSRB to be **low**. The University has long standing relations with over 20 PSRBs for the professions it serves in the areas of law, business, accounting, management, nursing, technology, and psychology. The University works closely with its PSRBs, understanding their requirements and anticipating and reacting quickly to any upcoming changes. In some disciplines, for example, in the changing landscape of legal education, the University is seen as a trusted advisor for the sector. For programmes which are dependent upon the approval of a PSRB, the outcome of the annual monitoring is shared with the respective bodies. Formal PSRB submissions, visits, and audits, are overseen centrally by the Dean of Academic Quality & Policy.

1.6. Disruption to University Activity

We consider the likelihood of a term-time programme disruption, save for very short-term issues such as extreme weather or minor IT issues, to be **low.** We consider this risk to be low as we have high-end facilities for learning, teaching, and assessment which are all either new

or recently refurbished, in addition to using world leading software and technology in the delivery of learning, teaching, and assessment to facilitate in-person and online programmes.

We have dedicated facilities teams and service providers who monitor and manage our property portfolio and ensure that maintenance issues are dealt with swiftly, so they do not become disruptive events. Furthermore, we manage out capital projects to ensure that centres are not disrupted and remain fit for purpose. Moreover, we have dedicated learning and teaching, assessment operations, and IT support teams who monitor and support all online and technologically supported learning, teaching, and assessment activities.

In relation to IT, we have dedicated IT systems with back-ups. We also use third-party technology which could be transferred to a new provider swiftly. Leading and managing our IT provision are both a Chief Product and Technology Officer and Director of IT and PMO through specialist teams. Where possible we used cloud-based technology, so we further minimise any risk of disruption to an end user. The increased use of technology has undoubtably increased risk concerning items outside of our control (i.e., students' kit and local environment). Whilst we cannot control individual student's environments, we provide support in all instances where possible. We always take these factors into account if/when considering any technological solutions.

The University has business continuity and IT disaster recovery plans in place to ensure the institution can keep operating if unexpected/unforeseen circumstances arise. A recent example of this serving us well was across the Covid-19 pandemic, where we were easily able to transition all teaching, learning, assessment, and support activity online.

1.7. Closure or Change of Use of a University Centre

The risk to continuation of study due to closure or change of use of a University centre is **moderate.** The University has 14 centres across England, most of which are multidisciplinary and often jointly used with other part of the BPP Education Group. Some of these centres are owned by the BPP Education Group and some are leased. As the University operates across many different centres, there is a likelihood that some changes will be required in future to best optimise the usage of space and to ensure a positive student experience. Risk mitigation to change of centre is discussed in Section 2.

1.8. Withdrawal or Suspension of Programmes

The risk that students will be impacted by the withdrawal of programmes is considered **low.** We have a lean programme suite which is in line with our principles and strategy. Should we suspend or withdraw programmes, we have a commitment to teaching out until every student has completed. The University has established procedures for the approval of programme suspension and withdrawal via the Education and Standards Committee and the Academic Council, which duly consider the impact on students and the arrangements for their continuation and completion in every case. In all instances, the University will continue delivering until the last student has completed and will support students with transfer to another programme or institution in line with the Student Transfer Plan, if that is their preference.

1.9. Inability to Deliver a Programme in a Subject Area

The inability to deliver a programme in a subject area is **low.** The University's programme portfolio is aligned with the University academic strategy and is focused on professional discipline areas in which the University has long established expertise and sector reputation, like law, accountancy, and business.

In rare instances where the University may need to close a subject area, it would always undertake the following:

1. Take all reasonable measures to teach out;
2. If teach out is not possible, to secure places with an analogous provider;
3. Provide students with independent legal advice;
4. Offer students compensation depending on the outcome of 1., and 2., and the University's refund and compensation policy; and,
5. Offer guidance and counselling to students.

- **Closure of the subject area of Psychology**

The risk resulting from the closure of the subject area of Psychology is **low.** The University took the decision to close the subject area of Psychology, and initiated planned arrangements to achieve this without disruption to the student experience and student completion. Current programme delivery arrangements will remain in place and students in the subject area will be taught out as per point 1., above. Students will be provided advice and guidance to support them through this transition, and the University can assure that both academic standards and the high-quality support associated with the programme will be maintained during the teachout period, including full access to the University's entire provision of services and resources. Staffing resource for the programme remains consistent and compliant with both the OfS B2 On-going Condition of Registration, and British Psychological Society (BPS) Student Staff Ratio (SSR). Staff who teach in the area of Psychology are also permanent members of staff in the Business School, and are expected to remain with the University following the closure of the subject area of Psychology. We therefore do not anticipate any changes to staffing during the teach-out that would affect delivery of the subject-area, with the risk as **low**. Liaison has taken place with the BPS in order to provide assurance on the maintenance of academic quality and standards in delivery, levels of student support required and provided, the anticipated duration of the teach-out, and the maintenance of adequate SSRs over the duration of the teach out in order to maintain accreditation. The loss of PSRB accreditation from the BPS is considered as **very low**, as the teach-out arrangements reflect continued operation of the programme under the terms as accredited by the BPS.

1.10. Transfer of Programmes to Another Provider

The risk of transfer of a very small number of programmes to be delivered by another provider is **low.** The University would consider ceding specific provision in subject areas that are not of strategic priority to third party providers under a teach out situation where all University students can choose to continue on the same programmes, with the same staff and in the same premises until their programme completion. They would be awarded the BPP University awards for which they originally registered. Any third-party provider would operate under BPP University's academic regulations via a validation agreement, after approval by BPP University's Academic Council and the University Board of Directors. There would be no material changes for current students, but the programme(s) would not be open to future cohorts. Risk mitigation to transfer of programmes is discussed in Section 2.

1.11. Termination of Partnership

The University delivers a range of programmes with delivery and support partners. Where possible, we have diversified our partnerships, so a programme is not reliant on one partner to continue. This reduces the impact of a programme failing due to partner closure. At the approval. At the approval stage of every partnership a teach-out plan, in the event of failure, is

articulated and approved by the Academic Council, which has a majority of expert, independent members. In general, our partnerships are stable, and we maintain good relationships and so we assess the risk of partnership failure generally as **low**. However, we are closing down our *endorsed provider network* and so, in this specific instance, we assess the likelihood of terminating Endorsed Provider partnerships as **high**. We have two overseas Endorsed Providers who provide support (such as physical learning communities; physical libraries; technology and study support) to specified BPP University online programmes, including undergraduate law and business. We would assess the risk to non-continuation of study, due to the termination of Endorsed Provider partnerships, as **medium**. It is emphasised that these in-country partners provide only access to premises and additional support on BPP University's otherwise free-standing online programmes, which are delivered and assessed wholly by BPP University. The delivery of these programmes is not in any way dependent on the Endorsed Provider support; however, there may be students who do not wish to continue study without the support of the Endorsed Provider, and we have agreed with our partners that they will continue to support students through to graduation.

1.12. Loss of Key Staff

The risk that we are no longer able to deliver material components of our programmes due to loss of key staff is **low.** We have teams teaching in most areas as part of a wider departmental structure. We mitigate against this risk by maintaining good networks in all subject areas so that we can draw in replacement tutors should the need arise. We are able to recruit associate faculty to teach in specialist areas and we provide them with extensive teaching support. We maintain a portion of our teaching base as flexible, to enable us to handle staffing shortages and to manage demand peaks.

1.13. Changes to Programme Content

The University does not anticipate any major changes to programme content, and we therefore assess the risk of changes in content to students' continuation of study as **low**.

We are always seeking to enhance the experience of our students and therefore, in some cases, it is necessary to make material changes to our programmes. Changes to programmes are carefully managed through the University's programme review and approval processes. Every programme is validated for no more than five years before requiring further approval and every programme undergoes annual monitoring, which includes consideration of feedback from faculty, students, and external examiners, to ensure that academic quality and standards are maintained. Minor and major modifications to programmes are managed through the Dean of Academic Quality & Policy and the Education and Standards Committee. Due regard is given to the impact on students and determination is always made on the date from which any changes would take place and the cohorts affected. Such decisions seek to protect students and prevent disruption to study. A communication plan to students is also agreed and students are invited to agree to any changes. Where a student does not consent to changes, they are taught out on the original validated version of the programme.

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

2.1. Closure or Change of Use of a BPP Centre

The University's distributed, flexible network mitigates against the risk of centre closure. In addition, as highlighted in Section 1, some of the centres are owned by the BPP Education

Group so we are able to manage our property portfolio. Our approach would always be to teach our current students with minimal disruption to their studies. With 14 centres across the UK and many programmes also validated for online delivery, in the eventuality of a centre closure, students would always be given the opportunity to transfer to another centre or to the online version of the programme (where available). Individual cohort implications and students' personal circumstances would be taken into account and compensation offered, as appropriate per the University's refund and compensation policy embedded into the Student Terms and Conditions. If relevant, this would include reimbursement for travel costs, or partial refund if a student chooses not to agree to the change. In all instances, a student communication plan would be devised at the earliest opportunity and all students affected would be invited to agree to the change. Proportionate compensation would be given for students who choose not to accept the new proposition.

It is emphasised that such measures would be undertaken with due academic consideration, through all appropriate University committees and Schools, Academic Quality, Legal, Estates and Finance would all be involved to ensure a smooth transition for students with minimal disruption. In addition, the University has DfE, SLC and Student Sponsor designation across many of its centres and its online provision so students could be accommodated. The University would notify all these bodies of changes to location.

2.2. Transfer of Programmes

If the University enters into a validation agreement with a third party, all relevant staff would transfer over and no new students would be registered with BPP University. Transfer arrangements would be made with the third party and students would be given the option to remain with BPP University or transfer to the third party.

All students who opted to remain with BPP University would continue to be taught on the programmes that they enrolled for. They would be taught by the same staff, under the same academic regulations and they would receive their award from BPP University. BPP University would continue to award the degrees and would maintain responsibility for academic standards under its existing governance structure and regulatory framework. Access to all BPP University facilities and services would remain in place for all BPP University students so that any disruption that students would experience would be kept to a minimum and under review.

Students would be taught under a subcontracting relationship between the University and the third-party provider, as allowed in our student terms and conditions.

This Student Protection Plan should be read in conjunction with BPP University's Student Transfer Plan that sets out the procedures in place for students transferring to, or from, a programme offered by BPP University.

2.3. Endorsed Provider Closure

All students supported by an Endorsed Provider are BPP University students studying a programme entirely delivered online by BPP University. We are committed to ensuring that each student can complete their studies. We will protect students by:

- Supporting all students to continue on their programme through existing support mechanisms;
- Having agreements in place with each partner to ensure that they will continue to support BPP University students during the teach-out period;

- Offering students the opportunity to study, subject to visa requirements, at a UK centre to complete their studies;
- Offering and supporting students with the option to transfer to an analogous programme supported by the Endorsed Provider, delivered by another awarding body.

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

Our Student Terms and Conditions for an acceptance of an offer made by BPP University include our refund policy which includes provisions for refunds, compensation for maintenance and travel, and bursaries, which can be found here. We are able to meet the financial implications of our refund and compensation policy as highlighted in Section 1. In summary, the University has cash reserves which would be more than sufficient to provide refunds and compensation for those students for whom we have identified an increased risk of non-continuation of study. The University also has insurance provision in place.

4. Information about how you will communicate with students about your Student Protection Plan

4.1. All iterations of this Student Protection Plan (SPP) have been written in consultation with stakeholders, including students. The Students' Association takes a leading role in drafting this section of our SPP:

- The University has invited Student Voice Representatives who work closely with the Students' Association, to review and comment on this SPP.
- The Students' Association team has provided feedback on the draft SPP and the Students' Association unanimously support and endorse the wording of this SPP.
- BPP Students' Association is governed by an independent Board of Governors which is chaired by the Director of University Central Administration and consists of independent and external members. The Students' Association is led by a Student President and is supported by an extensive network of Student Voice Representatives who are involved in representing the student voice across the institution, and who also hold representative positions across all layers of our academic governance system.

4.2. We have publicised the SPP to current and future students by:

- Placing it on the University website. This will be clearly signposted so that it is easy to find by current and future students.
- Include it on The Hub (the University's Virtual Learning Environment)
- Include reference to it in the Student Handbook incorporating the Student Induction Guide which is given to all students at registration. A PDF copy of this guide is also published on the Students' Association Website, and also The Hub.

4.3. The SPP will be publicised to staff through:

- Inclusion at all staff inductions for new staff
- Internal communications to all staff
- The University intranet

4.4. The SPP is reviewed annually by the Education and Standards Committee which is chaired by the Vice-Chancellor and has among its members, two student representatives and the President(s) of the Students' Association. The Education and Standards Committee reports to the Academic Council which is the most senior academic authority of the University. The Education and Standards Committee has oversight of university compliance with consumer protection legislation. Students will be involved in any changes or updates to the SPP via focus groups and through our termly Student Staff Liaison Committee meetings. Students are also on all Boards and Committees and will have sight of updates as they progress through the Boards and Committees of the University. If we need to implement new measures in this student protection plan, we will work with the Students' Association to provide them with the details of the situation so that they can provide independent advice and guidance.

4.5. We will inform our students if there are to be material changes to their programme via email and by notices on the The Hub at least 3 months' in advance, where possible. Where practicable, students will be able to meet their Programme Leader, Personal Tutor, or Programme support team to discuss their individual circumstances.

4.6. If the University needs to activate the SPP, internal scrutiny and requisite approvals on the implementation and communication strategy will be sought from the Academic Council and Board of Directors. The implementation would be overseen by the Vice-Chancellor's Office. Affected students would be contacted at the earliest opportunity, with a proposition which would seek to protect the interests of students and offer solutions and/or compensation according to the situation and students' individual circumstances. The OfS and other relevant regulators will be promptly notified and consulted as, appropriate.

4.7. The Students' Association will be fully engaged, and the Independent Welfare and Advice Team will be on hand to support students as necessary if we need to implement the measures in our SPP. Support and counselling are also available from the Inclusion and Learning Support team to protect all students' wellbeing.