

Annexure D: Template for a student protection plan

Provider's name: **SP JAIN LONDON SCHOOL OF MANAGEMENT (SPJ UK)**

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Student protection plan for the period 2022-2024

INTRODUCTION

This Student Protection Plan (the 'Plan') describes what SP Jain London School of Management Ltd (SPJ UK) ('the School', 'we' or 'us') will do to protect students' interests in the event of the School making a material change to a programme or programmes or having to stop providing higher education. Its purpose is to make students and prospective students aware of the range of potential risks to the continuation of their studies, how those risks may differ based on individual students' needs, characteristics and circumstances, and our view of the likelihood that those risks will crystallise. It also outlines what measures the School has taken to mitigate risks and what it would do to safeguard students' interests in the event of the School having to make a material change to a programme or programmes.

This Plan should be read in conjunction with the School's Teach Out Policy and Refund and Compensation Policy.

WHAT IS A MATERIAL CHANGE?

Material changes may include (but are not necessarily limited to):

- the closure of the School due to business failure
- the closure of our campus
- the suspension or discontinuation of one or more programmes
- the discontinuation of the partnership with our awarding body
- a major change to a programme
- loss of registration with the OfS
- loss of permission to recruit overseas students
- external disruption to programme delivery
- loss of degree awarding power

BACKGROUND

The School is a subsidiary of S P Jain Education FZ LLC (S P Jain), which has been operating since 2004 and has campuses in Dubai, Mumbai, Singapore and Sydney. The success and reputation of our operations have led S P Jain School of Global Management (SPJ AUS) to be recognised in Australia by Australia's regulatory body – the Tertiary Education Quality and Standards Agency (TEQSA) and re-registered for 2nd time in 2020 by them for the longest term of 7 years without conditions. The School is well reputed for its multi-country model that has led to great placement outcomes and a key factor, why the flagship Global MBA has been ranked highly within the top 100 MBAs by top publications like Forbes, The Economist and Wall Street Journal. Over the years, SPJ AUS has built significant reserves without any debt and would financially guarantee the SPJ UK.

SPJ AUS is a respected higher education brand. We have established this reputation while maintaining the necessary quality standards required under the Higher Education Standards

Framework (HESF); and have implemented a range of mechanisms to ensure consumer protections for international students protected under the Education Services for Overseas Students (ESOS) Act 2000. We have operated for more than a decade in the regulated Australian system and all our international campuses adhere to strict regulatory and quality standards.

S P Jain's financial records show that the School is in a sound monetary position. As per the annual Provider Risk Assessment Reports issued by TEQSA in the year 2020, SPJ AUS has been rated "low risk" on the two aggregate ratings – risk to students and risk to financial position. These ratings confirm that S P Jain is a financially secure business, with no debt and sizeable reserves. Moreover, the financial performance of the institution will be monitored continuously, and our annual accounts will be externally audited.

The School has in place a legally binding commitment from the parent company to ensure the London entity is financially sustainable, and to meet any costs associated with market withdrawal.

The School will manage its operations in London according to the highest standards of corporate and academic governance. We have a formal Risk Management policy and Business Continuity plan designed to manage, mitigate and, if necessary, respond to the risks identified in this Plan. Responsibility for monitoring these risks will reside with an Audit and Risk committee, which will report directly to the Governing Board.

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

In this section we identify the range of risks to the continuation of our students' studies, the severity or impact of those risks to our students and our view of the likelihood of these risks crystallising. We describe what we would do to protect students' interests in the event of these risks crystallising in the next section.

School closure

We think that the most likely cause of the School having to cease operations completely during the first few years of operations as being a failure to attract and recruit enough students to maintain our financial viability. The impact of closure would be **very high** on all students, but we regard the likelihood of it happening as **very low** because most entrants will be existing SP Jain students transferring from other campuses overseas. We know there is strong interest in the London campus in the markets we serve; therefore, we took the decision to establish a London campus in the first place. Moreover, the School has the support of a large and well-established global organisation which is prepared to sustain us through any short-term financial pressures.

Campus closure

There are several scenarios in which we may have to close our campus, including a fault with the campus itself (for example, caused by flooding) or an extrinsic event such as a resurgence of the Covid pandemic.

We regard the likelihood of our having to close the campus due to issues with the campus itself as **low** because our landlords are legally responsible for undertaking regular safety audits, maintenance and testing of systems to ensure the building remains fit for purpose.

We regard the likelihood of our having to restrict access to the campus due to Covid-19 as **high** for as long as the pandemic endures, owing to the possibility of new variants of the disease causing further lockdowns.

The impact on students of campus closure depends on the length of the closure. For short-term closures (perhaps one or two days), the impact will be **low** because we will be able to reschedule the timetabled teaching sessions and other activities that would have taken place on those days.

Should the campus have to be closed for longer – for example, an indefinite lockdown period – then we would move the delivery and assessment of our programmes to our digital platforms, allowing students to continue with their studies without having to attend the campus in person. Thus, the impact on students of an indefinite closure would also be **low**.

Last year we faced a similar situation with the Sydney Campus remaining closed for over a year. SPJ AUS offered its students flexible options. They could either study in Dubai (which was open), study online through the School's cutting edge ELO platform, or defer by a year. Students could choose any option and therefore there was no attrition and high student satisfaction. The same would be considered by SPJ UK. Thus, the impact on students of an indefinite closure would also be low.

SPJ UK will continue to take these steps throughout the period of the Covid-19 pandemic in the UK to ensure that it is able to maintain continuity of study for students in a range of possible future scenarios.

These scenarios cover a range of possibilities where the government may ask educational settings to take precautions to limit the virus transmission, such as the introduction of social distancing in the classroom environment. We would seek to maintain as much face-to-face delivery as possible while minimising disruption for students and by minimising timetable changes mid-semester as much as possible. Sessions that cannot be delivered in person would be delivered online.

Further, there will be no changes to the curriculum, style of teaching and assessments. Our facilities for technology will ensure that the classes will proceed as per the schedule and all our staff including the student support staff are well trained to handle any issues/concerns that may arise as a result.

Should the campus have to be closed for a long period owing to a problem with the campus itself, then our landlords would be obliged to offer us suitable comparable accommodation nearby. Given that the programmes we will deliver will not require any specialist equipment or accommodation, this should be relatively easy for our landlords to arrange. Additionally, the operation of the School on different international campuses will give the SPJ UK students the option of attending at another campus location if required.

Programme discontinuation

The most likely scenario in which we may have to consider discontinuing a programme in the first few years of operations is if it fails to recruit enough students to become or remain financially viable.

We acknowledge this would have a high impact on the students enrolled on the programmes affected, but we regard the likelihood of it happening as low because based on our strong brand, historical data and a differentiated offering which is outlined in detail in our business plan Section 3 (Business Case). In this section we have outlined our strategies and existing infrastructure for attracting local and international students. Moreover, as part of our annual planning process, we will review the performance and, sustainability of all programmes so that we can be confident about their future viability.

Discontinuation of the partnership with our awarding body

Should our awarding body choose to discontinue our partnership, for example due to concerns about the quality of our programmes, our students would be unable to complete their studies and achieve a UK higher education award. The impact of this on all our students would be **very high**, but we think the likelihood of it happening is **very low** because:

- We will maintain the highest standards of corporate and academic governance and quality assurance to safeguard academic standards and the quality of students' learning experiences. The efficacy of these systems will be tested by our awarding body and the Office for Students (OfS) before our new programmes commence.
- We will maintain a close working relationship with our awarding body designed to identify and address any concerns or issues about the delivery of our programmes before they become serious problems.
- We will make provision in our agreement with our awarding body that, in the event of our awarding body choosing to discontinue the partnership, students already enrolled will be taught out.

Major change to a programme

We believe the most likely cause of our having to make a major change to one or more programmes at short notice is a resurgence of the Covid-19 pandemic placing restrictions on access to our campus, as described above.

Any resurgence of the pandemic may also lead to unexpected staff absences due to illness. However, we regard the associated risk of disruption to students' studies as **low** because our programmes will be taught by teams of academics and we will not rely on single highly specialist members of staff to deliver any one part of the programmes. In the event of long-term illnesses among a significant number of staff in London, we would be able to call on the support of the wider SP Jain organisation and initiate short-term transfers of academic staff from other campuses to support teaching, assessment, and other duties through digital technologies.

For any other kinds of major changes, students will have the double protection of the School's own programme change procedures and those of our awarding body, both of which require a careful consideration of impact on, and consultation with, students.

The School's general practice is that any such changes to the programme should be carried out to apply to the next admitted cohort of students. In case, the in-year changes are required, the School has a

policy which requires careful consideration of the impact of the changes, and an evidence of engagement with the affected students as well as the approval from the Academic Board, which will consider whether the proposed changes are reasonable and have given due consideration to the best interests of the affected student cohort. It is possible that changes to modules might occur during a student's course of study, however the School will ensure that such changes will not lead to a discontinuation of a student's study. Where through consultation, any impact is considered by students to be beneficial, then we will seek to accelerate implementation for current students, whilst meeting quality standards.

Loss of registration with the OfS

Securing and maintaining registration with the OfS is a condition of the validation relationship with our awarding body and provides the UK students we plan to recruit with access to student support (including loans from the Student Loans Company). Therefore, losing our registration with the OfS would have a **very high** impact on all our students, and particularly those domiciled in the UK. However, we regard the likelihood of our losing our registration as **low** because we will have named senior staff and robust corporate and academic governance systems dedicated to meeting all the OfS's conditions of registration.

Our Memorandum of Agreement with our validation partner has a governance framework to ensure early notification of any potential weaknesses. This includes a named senior academic link, consideration of annual programme review, meetings with students and staff, and external examiner reports. Moreover, SP Jain has a Quality Assurance Framework (QAF) which establishes the overarching principles, framework and systems to ensure that quality is upheld within SP Jain. Any areas of concern relating to compliance will be addressed by the senior management expeditiously and effectively. The QAF affirms the commitment of the School to the ongoing process of consistent monitoring and continual improvement as a higher education institution.

Loss of permission to recruit overseas students

Since we plan for approximately two thirds of our students to come from overseas and require a student visa, it is crucial for our whole operation that we obtain and maintain permission from the Home Office to recruit overseas students. Thus, the impact of losing our permission to sponsor overseas students would be **very high** for all our students. However, we regard the likelihood of our losing permission as low because we will have named senior staff and robust corporate and academic governance systems dedicated to meeting all the UKVI's requirements. To be fully compliant with regulations of the UKVI we would be hiring an immigration firm. It is pertinent to point out that we have handled international students in Australia, with very similar requirements, and have had no infringement for over 10 years.

There is also the risk of sector-wide disruption or suspension to the recruitment of students from specific countries or regions owing to UK government's concerns about applicants from these countries. We acknowledge that the impact of such disruptions on students from the countries would be high, although there is little that the School would be able to do about it. However, this would not have an impact on the School as a whole because we will recruit students from a broad range of

different countries, meaning that an interruption to recruitment from one country would not jeopardise the viability of our programmes.

External disruption to programme delivery

External disruption to programmes may take a variety of forms. We regard the most likely sources of external disruption as:

- industrial action or terrorist incidents affecting the public transport networks many of our students are likely to use to reach our campus
- a prolonged outage of the IT platforms our students will depend on

How much impact such external disruption will have for our students depends on its longevity, with the impact increasing the longer the disruption goes on. We regard the likelihood of external disruption due to industrial action or terrorism as **medium** due to the location of our campus in central London. We regard the likelihood of a prolonged IT outage as **low** because the systems we will use are all third party, cloud-based platforms that work independently of one another. All have a good track record for reliability; the only outages we have experienced at our campuses elsewhere have been short-lived. In addition, we will undertake regular reviews and penetration testing to ensure that systems are not vulnerable to cyber-attack. We will also monitor cybersecurity through our institutional risk monitoring framework, and this will remain a priority to minimise the risk to the security of students' personal data, access to emails and software systems.

Loss of degree-awarding powers

The School has applied to the OfS for its own degree-awarding powers through the New Degree Awarding Powers (NDAPs) route. Should that application be successful, we will enter a three-year probationary period, beginning in June/ July 2023, during which we will develop our resources and capabilities to the point where we meet the degree-awarding powers criteria in full. Our progress during, and at the end of, probation will be assessed by the Quality Assurance Agency (QAA) on behalf of the OfS; unsatisfactory progress could lead to our degree-awarding powers being withdrawn.

We plan to recruit approximately 400 students to the 6 programmes we will name in our NDAPs application in 2023-24, rising to approximately 566 students in 2025-26 (the last year of probation). We intend to use our new powers for the undergraduate intake in June/July 2023, and for the postgraduate taught programmes from February 2024. By 2025/26, all new entrants will have been following SP Jain London School of Management awards for two years, though there may be a small number of students still completing Royal Agricultural University awards.

The impact of losing our degree-awarding powers during probation would be **very high** on the students on programmes leading to our own awards, but we regard the likelihood of it happening as **low** because we will formulate a comprehensive NDAPs plan which must be judged credible and realistic by QAA for us to acquire NDAPs in the first place. Thereafter, throughout probation the implementation of that plan will be closely monitored internally and subject to frequent and regular external review (also by the QAA).

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

In this section we describe the measure we will put in place to safeguard students' interests should the risks we have identified in the first section crystallise. Any consideration of refunding or compensating students mentioned in this section would be done in accordance with the School's Refund and Compensation Policy.

School closure

We have already explained that we regard the likelihood of the School having to close owing to business failure as very low. However, should the School find itself in a position where we have no option other than to close, we would consider the following measures to protect students' interests:

- where possible, the primary objective would be closing in a phased manner to allow current students to complete their studies with us
- in a situation where this is not possible, we would support students to transfer to an equivalent programme at another provider, including our validating body, and consider compensating students if, because of the change of location of their studies, they suffer demonstrable and material financial loss

alternatively, we may explore the possibility of merging with another provider to maintain all or part of the current provision

Campus closure

Other than in the context of a resurgence of the Covid pandemic, which we have dealt with in the first section, if part or all of our campus is rendered unusable for activities involving students, we would consider remedies including:

- relocating provision to an alternative location identified by our landlord
- rescheduling the timetabled hours to allow all the scheduled teaching to take part in the available facilities. This may include student contact sessions being held outside of usual planned hours. Where such an approach is taken, the students affected will be consulted first.
- delivering part or all of programmes through alternative means. Where such an approach is taken, we will consider whether this is appropriate for students who would be affected.

In the event that a student was unable to move their studies to an alternative location, or engage with alternative modes of study, we will consider compensating students if they suffer demonstrable and material financial loss.

Programme discontinuation

If discontinuation were to be proposed, the contracts we will have with our awarding body will provide for students on the programme affected to be taught out. Furthermore, the School's Teach Out Policy would protect students' interests by requiring the formulation and implementation of a comprehensive teach-out plan.

In the event of individual students not wanting to complete their programme of study at the School during any teach-out period, or the School having to discontinue the programme before teach-out was complete, we would employ other measures outlined above to facilitate student transfer to other providers to complete their studies and consider compensating students who suffered demonstrable and material financial loss.

Discontinuation of the partnership with our awarding body

We believe the likelihood of our awarding body discontinuing our partnership as being very low. However, in the event of this happening, the School will consider measures to protect students' interest, such as:

- working with the awarding body to ensure students could complete their programmes prior to the relationship coming to an end
- helping affected students transfer to an alternative programme, including at the awarding body
- trying to find a different awarding body for the same programme.

If these measures failed, or the alternative measures deemed unacceptable to some students, we would consider compensating students suffering demonstrable and material financial loss.

Major change to a programme

In the unlikely event of major in-year changes to programme content we will ensure that:

- any changes are restricted to the minimum necessary to achieve the required academic outcomes and quality of student experience
- affected students are notified and consulted with in a timely manner
- we work with students to ensure that any revised offer is still acceptable
- where necessary, the School would allow students the opportunity to withdraw from the programme
- if required, students would be offered every reasonable support to transfer to another programme, or provider

In the event that any student finds the revised offer unacceptable or were they not able to move their studies to an alternative location, or engage with alternative modes of study, we would consider compensating students suffering demonstrable and material financial loss.

Loss of registration with the OfS

In the unlikely event of deregistration, we would take all reasonable steps to minimise the resulting disruption to students by, for example:

- working with the OfS and our awarding body to allow enrolled students to complete their programmes
- where this is not possible, supporting students to transfer to similar programmes at other providers and, if appropriate, compensating students where they suffer demonstrable and material financial loss because of the transfer and/or due to disruption to their studies
- supporting students by providing any evidence required to facilitate the continuation of their studies with another provider
- exploring the possibility of merging with another provider to maintain all or part of the current provision

If some students were not able to move their studies to an alternative provider, the School would consider compensating students suffering demonstrable and material financial loss.

Loss of permission to recruit overseas students

In the unlikely event of our losing our permission to recruit or sponsor overseas students, we would take reasonable steps to minimise the resulting disruption to students by, for example:

- Working with UKVI to allow any registered students to complete their year of study/programme (in the case of suspension)
- Allowing any students who have obtained a VISA based upon an allocated CAS from SP Jain to enrol and commence their studies (in the case of suspension)
- Offering the students who have not yet travelled, the opportunity to postpone the application pending the resolution of the suspension
- In case of a revocation, SP Jain will provide assistance for the affected students to switch to an alternative sponsor

External disruption to programme delivery

In the event of a major and prolonged disruption to public transport networks near our campus, we would protect students' interests by ensuring that normal operations and services are maintained as far as possible. This may also include taking actions outlined for campus closure above. If the external event may be traumatic for students, we would offer through our student wellbeing services one-to-one support internally or referral for external support.

Loss of degree-awarding powers

The likelihood of this happening is low because we will formulate a comprehensive NDAPs plan which must be judged credible and realistic by QAA for us to acquire NDAPs in the first place. Thereafter, throughout probation the implementation of that plan will be closely monitored internally and subject to frequent and regular external review (also by the QAA). A summary of the plan against the five sections of the DAPs criteria is given below.

DAPs criteria and related risks	Mitigations
A: Academic Governance: the School's Academic Governance system is not fit for purpose	We have developed a comprehensive academic governance structure with clear and appropriate lines of accountability for the academic responsibilities we will have as a degree-awarding body. Our academic governance will be inclusive, with students and non-managerial staff playing their part as full members of Academic Board. Academic Board will also include external members to make sure we are taking account of independent points of expertise.
B: Academic standards and quality assurance: there is a failure to set and maintain standards and the quality of students' academic experience	We have developed transparent and comprehensive academic frameworks and regulations to govern how we will set and maintain the academic standards of our awards credit and qualifications. Our Quality Assurance Framework, which is already tried and tested in our campuses overseas, will ensure that academic standards are maintained and that our students enjoy a high quality academic experience, irrespective of their own backgrounds and characteristics, or of the way in which the programmes are delivered.
C: Scholarship and pedagogical effectiveness: the School's staff demonstrate insufficient scholarship and pedagogical effectiveness	We have already adopted a comprehensive set of policies and procedures for the recruitment, induction, development and promotion of staff, which will ensure not only that the staff we recruit are suitably qualified and prepared to teach and support students but also that they engage in continuous professional development to achieve their full potential. Professional development of staff will include the requirement to reflect on feedback from students.
D: Environment for supporting students: the School does not have an environment fit for supporting students	We pride ourselves on the quality and strength of the academic and pastoral support we give to our students at our other campuses outside the UK. We will extend the same strength of support to students in London by developing a state-of-the-art campus and learning resources, comprehensive services for non-academic support and careers guidance and a sophisticated monitoring system to make sure we track the progress of each individual student and intervene quickly if a student is showing signs of difficulty or disengagement.

<p>E: Evaluation of performance: The School does not have effective mechanisms in place to evaluate its performance</p>	<p>Our Quality Assurance Framework provides a comprehensive set of checks and balances, including regular reviews and thematic audits, for all aspects of our provision, including the maintenance of academic standards and the safeguarding of students' academic experiences. A hallmark of our Framework is external benchmarking to provide evidence of the effectiveness of our operations and inform continuous improvements.</p>
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In the event of our degree-awarding powers being withdrawn, we will protect the interests of students enrolled on these programmes according to our programme suspension and discontinuation procedure. This may involve supporting them to transfer to an equivalent programme at another provider (of which there are many offering similar programmes in London). Our use of the standard credit accumulation system for our own awards will facilitate any transfer process. If this is not possible, whether because an individual student is unwilling or unable to transfer to another provider, or because we are unable to identify an equivalent alternative programme, we will consider compensating students who suffer demonstrable and material financial loss.

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 Refund and Compensation Policy describes the circumstances under which we will provide refunds and compensation to applicants and students. It also provides clear rules about the value of refunds depending on when and in what circumstances students withdraw or are withdrawn from their programmes.

The School will refund all fees paid by commencing students including compulsory tuition, administration, and registration fees in the unlikely event that the School is unable to continue the delivery of the course, as set out in the signed letter of offer.

We may offer the student a place in an equivalent course (if applicable) with fees not in excess of the original course and no other extra administrative fees will be applied by the School.

As part of a risk-based management approach, the School will hold working cash reserves which will be considered sufficient to provide refunds and compensation for those students who might be at risk in relation to non-continuation of a particular programme. Our student compensation and refunds will be based on the Office of the Independent Adjudicator's (OIA) indicative compensation bands for distress and inconvenience wherever applicable.

4. Information about how you will communicate with students about your student protection plan

Our student protection plan will be published on our website and in the undergraduate and postgraduate prospectus.

Communication with Applicants

We will provide prospective students with information on the website about the courses on offer, how to apply, accommodation, fees and what it is like to be a student at the school. The Student Protection Plan will be linked in our Terms and Conditions at the application stage.

Communicating with our Registered Students

The Student Protection Plan will be communicated to registered students through a number of student communication channels that include the website, e-newsletters, topical and designated emails and/or social media channels.

Communicating with our Staff

We will ensure that staff are aware of the implications of our Student Protection Plan when they propose course changes, by providing training to relevant staff

Review of Student Protection Plan:

We will review our Student Protection Plan annually through our main governing committees. Information will be passed on to the students in case of the following:

- Major/minor modifications to courses or programmes: We might choose to make changes to a course/programme. This could be due to some feedback from an external examiner that it needs to be refreshed to make it more up to date. We might also decide to update based on student feedback or outcomes on the course/programme. We will include students in the conversation about what we want to update before this happens. The process for making changes is considered with our Academic Board, both before and after the change is made.
- We will also review proposed revisions to the Student Protection Plan with the Students' Council. We will undertake this annually through the Students' Council. We will also consult our students as part of other engagement sessions.
- Students are also notified of any other changes to the Student Protection Plan itself.
- We are committed to communicating changes to students as early as possible, with clear information and options. We will include student consultation and representation in our decision making.
- Once a change has been approved, students will be informed at the earliest opportunity by the staff, directly through email communications, FAQ pages where appropriate, and students will be invited to attend one-to-one and group meetings with the Head of the programme to discuss their views so that we can take them into account.
- In case if we are making significant changes to the programme, we will provide initial communication as described above. The communication will include an explanation of the proposed changes, details of the implementation date, how the changes will affect students and how to access further information.
- We will also ensure that students are aware of any external information, guidance, and advice such as guidance for students from our regulators like the OfS.

Activation of the Student Protection Plan:

If it is required to implement the procedures in our Student Protection Plan, a team would be established that comprises of members of the academic staff, senior administrative staff, and a student

representative, to follow the necessary processes and associated timelines, to ensure that the student learning experience is maintained and that full consultation with students has taken place. The consultation would be designed to help students and inform them if there are to be any major/material changes to their course.