# **Student Protection Plan**

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# Student protection plan for the period 2024/25

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

Items one through four are considered to be unlikely and hence mitigating actions are reported in this section. Items five through eleven are considered to be "less unlikely" and hence our mitigating actions are reported in section 2.

## 1) Financial risk

The Royal Veterinary College (RVC) is a world-leading higher education institution with a long tradition of teaching, research, and clinical excellence, underpinned by sound finances and effective governance. The RVC has delivered a consistently positive financial performance from strong revenue growth and robust management of expenditure and has built up healthy cash reserves. Our most recent financial statements (for the financial year ending 31 July 2023) can be found at RVC Annual Report and Financial Statements 2022-23. These show that a positive financial outturn was again achieved, and cash reserves remained healthy. Our external auditors raised no "going concern" issues. Financial performance in 2023-24 continues to be strong and an above budget operating surplus is forecast.

The RVC continues to invest resources to ensure that all student cohorts are able to achieve their learning outcomes. The award of an overall silver rating in the 2023 Teaching Excellence Framework exercise is evidence of the RVC's teaching quality.

As part of a major programme of capital works at our Hawkshead campus, a new Student Learning Centre has recently been completed (comprising lecture theatres, directed learning rooms, a learning resource centre and social learning space) providing a high quality and attractive learning environment for current and future students. We also continue to invest in our Camden campus and in digital learning resources.

The 2024-25 budget and four-year financial forecasts are being finalised for approval by the RVC's Council (governing body) in July 2024. Demand for our teaching programmes remains strong and forecast growth is targeted in other areas of our business. There are, of course, ongoing pressures on finances, particularly in the current inflationary environment. As a specialist higher education institution delivering high-cost subjects and based in London, the RVC is subject to particular challenges.

In this context, it is essential that robust financial management and governance processes are in place to ensure value for money is achieved. These include:

- A Financial Operating Strategy, approved by RVC's Council, setting out how we will conduct our financial affairs to enable delivery of the RVC's strategic objectives and ensure we remain a financially sustainable institution. This is being updated in support of the RVC's new <u>Strategic Plan</u> 2022-26.
- Performance monitoring against agreed financial KPIs
- An established financial planning and budgeting process, including scenario modelling
- Robust control of costs through strict management of the staffing establishment and sound procurement practice
- Strong budgetary management supported by regular financial reporting and clear lines of budgetary responsibility
- Regular review and re-assessment of strategic and operational financial risks
- Robust oversight of capital projects
- A strong internal financial control environment validated by periodic internal audit reviews and annual external audit
- A comprehensive due diligence process for external partners involved in educational delivery supported by contractual arrangements which protect continuity of study
- A disciplined approach to the approval of new projects and initiatives requiring supporting business cases

The RVC regularly reviews and updates its business continuity plan to ensure it remains fit for purpose. The business continuity plan is supported by departmental risk registers and a Strategic Risk Register which is reviewed by the Audit and Risk Committee and RVC Council quarterly. This means that risks are managed proactively throughout the RVC to ensure student welfare and experiences are always protected.

The RVC's response to the pandemic was a real and significant test of our business continuity resilience and the lessons learned are informing our ongoing approach and response.

For the reasons outlined above, we consider that the risk to the continuation of study for our students due to financial pressures remains low.

# 2) Professional accreditation of courses

In November 2018 our BVetMed course was reviewed by all accrediting bodies (RCVS, AVMA, EAVE, SAVC and AVBC) and reaccreditation secured. In July 2019 our FdSc Veterinary Nursing was also reviewed by RCVS and received full accreditation for a further five years. Our undergraduate biosciences degrees are accredited by the Royal Society of Biology and this provision was reviewed in autumn of 2020, resulting in continued accreditation for a period of five years. The next cycle of accreditation for all undergraduate degrees will be in 2025/26. We consider the risk of non-reaccreditation to be low as we report annually to these bodies who have been satisfied with our financial standing, continuous course improvements and student outcomes. It should be noted that given the nature of our accreditations there will be a notice period. For the BVM programme, we. We have three different accreditations, and we consider it highly unlikely that we would lose all three resulting in the programme not being accredited.

## 3) Loss of UKVI Tier 4 license

We consider that the risk of losing our UKVI Tier 4 license to recruit and teach international students to be low. We are a Premium Sponsor with a subscription cost of £8 k p.a. which ensures we are up-to-date with policy & process changes and receive bespoke advice on our internal processes and individual decisions where necessary. Our international standing, tuition fee levels and entry requirements ensure we are recruiting genuine students who are likely to complete their studies successfully. An audit of the RVC's ongoing UKVI compliance (including duties as a Tier 4 and Tier 5 sponsor) was undertaken in 2020/21 by KPMG to assess on-going compliance with implementation of recommendations in 2021/22. UKVI compliance is also reviewed as part of the RVC's ongoing Risk Register monitoring.

#### 4) Optimising student health and well-being

To optimise our students' overall experience and their ongoing health and wellbeing, the RVC has a dedicated Directorate for Learning and Wellbeing with extensive resources in a range of areas including Wellbeing, Study Skills, Digital Skills and Employability. The Directorate has a ring-fenced budget to ensure a range of initiatives aimed at addressing and improving our students' wellbeing, as well as mental health, are prioritised.

#### 5) Loss of specialist teaching staff

To deliver our BVetMed and BVSc programmes, we require specialist clinicians to be employed by RVC in our teaching hospitals. Due to competition with private practice for these specialists we consider the risk of losing or not recruiting these staff to be moderate.

# 6) Inability to deliver postgraduate research programmes.

Such programmes typically relate to the expertise of one individual academic. In the event of that individual not being available, we will make bespoke arrangements for any research students who they are supervising. For this reason, we believe this risk is moderate.

#### 7) Securing adequate clinical caseload for the BVetMed/placements for FdSc Nursing

In order to provide an adequate range of clinical experiences for our BVetMed students we need to work in partnership with external organisations. There is a moderate risk that we will not be able to source or secure these contracts due to increased competition with other HEIs delivering veterinary training. For the successful delivery of our FdSc Nursing we must secure placements for our students, currently managed in partnership with the College of Animal Welfare. This contract has been renewed on an ongoing basis and will be subject to a periodic review in 2027.

## 8) Disruption to student learning and/or assessment due to building works

Over the last 10 years we have made capital investment of approximately £90million to ensure that our facilities remain fit-for-purpose and continue to support the learning and wellbeing of our students, including those with learning differences and/or additional needs. Our most recent development – a £45M project – which includes extensive new teaching and learning facilities is nearing completion. The project has been planned and managed to ensure that disruption to student learning and/or assessment due to building works is minimised. Given our experience in managing such projects, we consider this risk to be low.

# 9) Disruption to student learning and/or assessment due to strike action

It is not possible to evidence the number of academic staff who are registered with a trade union and may take strike action as subscriptions may be paid directly to the union. At RVC we believe numbers to be low as few staff have participated in recent strike action arising from pay and pensions changes. However, we do recognise that a single academic on strike could affect a significant number of students due to lecture size, so consider the potential for disruption to be moderate.

# 10) Disruption due to pandemic

The experience of delivering our courses through the COVID-19 pandemic has meant that we have robust plans in place should there be further disruption from this or any other pandemic. We are confident, based on recent experience, that we have the capacity to be able to respond in an agile manner should there be any disease outbreaks, and this is regularly monitored through our Strategic Risk Register. We therefore consider the risk of disruption to student learning and/or assessment to be low.

# 11) Cyber security

We have recognised and responded to the current climate of raised cyber security threats in which the student community needs protection from and employ counter measures to the wide range of random phishing and sophisticated targeted cyber security attacks regularly taking place. The RVC has an active Information Security Group involving senior managers from both IT services and other professional services areas which meets regularly. The RVC is continuing to invest in its cyber defences and spends 10% of its IT budget on Cyber Security.

This risk is regularly monitored through our Strategic Risk Register, and we have assessed the risk presented by cyber security threats within the last 12 months via an external cyber security audit. The outcome of this assessment was positive due to the existing measures in place and the planned activities to mitigate further this threat. The current risk level is moderate.

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

#### 1) Loss of specialist teaching staff

We endeavour to reward all staff for their contributions via competitive salaries and recognition of excellence via promotion and reward opportunities. As an example of our proactive approach to pay and reward we have a competitive pay scale for our clinical staff making RVC clinical veterinarians as well or better remunerated than any other HEI in the UK or Europe. We also continue to highlight the benefits of working at RVC – we operate the largest small animal referral hospital in Europe and provide additional benefits such as working within multi-disciplinary teams to facilitate advanced patient care at a tertiary referral level. We have extensive clinical research opportunities and opportunities to work within comparative biomedical research groups in one of the best equipped veterinary centres in the world. Please see https://www.rvc.ac.uk/about/our-people/human-resources/information-for-staff/benefits-and-reward for further information.

## 2) Inability to deliver postgraduate research programmes.

This is likely to only happen where a research supervisor is unable to continue with their duties or leaves the institution. In either case the RVC is confident that we will find alternative supervision or to put financial and contractual arrangements in place with the exiting supervisor to maintain the PhD supervision relationship

# 3) Securing adequate clinical caseload for BVetMed and placements for FdSc Nursing

We work in partnership with external organisations and veterinary practices to provide an extensive clinical caseload in a diverse range of practices and charity centres for our undergraduate and postgraduate clinical training. These partnerships are formed and reviewed by the Collaborative Clinical Training and Development Group which reports to our Teaching Quality Committee and ultimately Academic Board. We have provided this group with legal training re: contract formation and student protection. All contracts have teach-out clauses within them to ensure that students are supported for the duration of the contract and training is provided by the RVC to external staff to assure the quality of the student experience and learning. We partner with a range of providers to ensure that we are not overly reliant on single relationships for our largest student group. Whilst we have significantly fewer students on our FdSc Veterinary Nursing it cannot run without sufficient placements for those students. We have renewed our contract with the College of Animal Welfare that currently provides these placements.

# 4) Disruption to student learning and/or assessment due to building works

Ongoing building works causing disruption to ongoing business, poor quality staff and student environment, adverse financial impact and deterioration in external stakeholder relationships all appear prominently on our risk register. Building works inevitably involve some level of disruption but we are taking the following measures to mitigate any adverse impact on students. The programme schedule is mindful of the academic calendar with work on key teaching spaces scheduled for times of least use, such as the summer period. Where this is not possible, we will be utilising alternative teaching spaces at either campus and/or deliver teaching sessions remotely via a blended learning model. Additional travel costs associated with any move of onsite teaching will be met by the RVC in line with our Student Fee Policy.

Additional support or concessions for students with disabilities will be considered on an individual basis related to need. Alternative delivery modes will be utilised wherever feasible – for example, recording of lectures via Panopto and the availability of additional learning materials in our VLE. During 2023/24 we returned to some in person examinations, assessing benefits and an ability to ensure robust secure examination environment. The RVC has committed to using off campus local, accessible and appropriate venues for these examinations. In 2024/25 it is expected that more of the examination schedule will return to an in-person format. Additional support or concessions for students with disabilities will be considered on an individual basis related to need.

5) Disruption to student learning and/or assessment due to academic strike action
It is challenging to mitigate the impact of strike action in advance as notice of action is not required of staff. However, where notice is received, we inform students in advance so that unnecessary travel is avoided. Where in-class assessments are compromised these are re-scheduled and if additional costs are incurred by students to attend the re-scheduled session these are met by RVC in line with our <a href="Student-Fees-Policy-2024-25">Student-Fees-Policy-2024-25</a>. Examinations are likely to continue in the event of a strike as invigilators are external to RVC and are managed by Academic Registry staff; we also have the ability to deliver online proctored examinations. In the event that strike action involves withdrawal of marking activity, we may be unable to adhere to our assessment board schedule due to lack of availability of external examiners (see Section 1, Item 9 re: low percentage of RVC staff undertaking strike action). In this eventuality, we would run a provisional board to the original schedule and confirm results and awards as soon as external examiner input had been received. Should any delay in award disadvantage a student we would encourage them to submit a formal complaint which outlined the

impact to them personally so that suitable resolution (including appropriate compensation) could be determined. We offer a small number of courses in collaboration with other HEIs and liaise with them regarding the impact of any strike action on our students, ensuring that our students studying at other institutions are not disadvantaged.

## 6) Disruption due to pandemic

During the COVID-19 pandemic period we successfully transitioned to blended delivery for all course teaching and assessment. We implemented measures aimed to minimise the health and safety risks associated with coronavirus/COVID-19 whilst continuing to provide an educational experience that meets the standards of our accreditors and expectations of the QAA and OfS. We have returned to face-to-face delivery but have maintained specific measures to ensure we can resume digital delivery should we be required to in the event of any disease outbreak. We utilise existing governance structures and formal committees (with additional virtual meetings or agreement by correspondence) to provide final scrutiny prior to approval and implementation of any specific measures.

# 7) Cyber security

Through significant investment in systems that prevent the introduction of malware to the network and filter out thousands of bogus emails every day, students are not exposed to most cyber threats and are able to use RVC's IT services as intended, in pursuit of their studies. The latest measures introduced in this area are a Security Information and Event Management (SIEM) system to automate analysis of threats and early warnings of possible compromise, a software vulnerability management system to manage vulnerable software, and a privileged access management system to prevent unauthorised privileged access to RVC systems.

In line with advice from the National Cyber Security Centre (NCSC), to defend against the latest generation of cyber security threats we have prioritised the rolling out of multi-factor authentication (MFA) across our systems and user communities as the foundation for ensuring student data and accounts cannot be compromised by a single point of failure from a breached password. Through the co-operation of students and staff the RVC is ahead of similar institutions in its MFA deployment programme and are working to apply MFA to the key student application, our Virtual Learning Environment, Learn.

We have improved IT infrastructure and Software as a Service (SaaS) applications to accommodate increased demand for remote work, study and teaching. We have strengthened the robustness of existing solutions for remote desktop (RDWeb) and virtual private network (VPN) access. To modernise and harden the security of the internal infrastructure and core perimeter, our IT team is devoting its available resources to migrating older legacy systems to newer technologies whilst operating a continual programme of applying software updates and security patches to the IT service catalogue. As part of this program of investment we are also upgrading much of the central security and network infrastructure, we are also reviewing cyber security policies and procedures and looking to move to a 24/7 operation.

Understanding that technical measures will never be the entire solution in countering cyber threats, we are also developing users' understanding of the importance of personal and institutional cyber security through additional communications and enabling students to protect their own data and devices. We will also be investing in a cyber security training and awareness package to help students and staff identify the most common forms of personally targeted cyber-attack.

# 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 Fees Policy sets out the refund arrangements for students who withdraw from their course. It also provides information on remedial measures for students in the event that a programme is materially changed or withdrawn. The policy covers:

- the payment of additional travel costs for students affected by a change in the location of their course.
- commitments to honour student bursaries.
- compensation for maintenance costs and lost time where it is not possible to preserve continuation of study.
- compensation for tuition and maintenance costs where students have to transfer courses or provider.

Our course information pages also provide information on costs that are, and are not, included in the tuition fee.

The RVC has sufficient cash reserves to provide refunds and compensation in, what we judge to be, the unlikely event of suspension of teaching activity for one or more programmes of study and resultant significant loss of income. As noted above in sections 1, 2 and 3 we have not identified any increased risk of non-continuation of study. We are satisfied that we have sufficient financial resources to meet the financial commitments in our refund and compensation policy.

We regularly monitor risks to both financial and teaching operations through our Strategic Risk Register.

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

- We publicise our student protection plan (SPP) to current and future students by including it in our student-facing policy webpage which is readily accessible from the study section of our website (https://www.rvc.ac.uk/study).
- In addition, we include the SPP in the online enrolment process for students who have accepted the offer of a place on any of the courses that the RVC provides. Students are required to acknowledge receipt in order to complete enrolment with the RVC.
- We remind current students of this document on an annual basis by requiring them to acknowledge receipt of the document as part of the annual online enrolment process.
- We will advertise the SPP to staff in a number of ways. It will be made available to current staff
  on staff pages of the intranet. It will also be provided to new staff with induction material and
  discussion of this document will be included in mandatory training courses for all new academic
  staff.
- We ensure that staff are aware of the implications of the SPP when proposing new courses by making consideration of the SPP a part of the 'Design and Approval of Courses' procedure, overseen by the Course Proposal and Development Group.
- It is also incorporated into procedures required to make any significant changes to a course.
  Course change documentation is reviewed by the relevant course management committee and
  requires approval by the Learning, Teaching and Assessment Committee, or the Research
  Degrees Committee and ultimately then Academic Board. In addition, course directors will be
  required to include consideration of the SPP in their annual quality improvement reports that are
  reviewed and approved by the Teaching Quality Committee.

- The plan was initially developed in collaboration with officers from the RVC Students' Union and will be reviewed annually by the Student Development Committee (SDC). It will be formally approved by Academic Board; both of these committees have student representation. However, if any new risks emerge and/or existing risks change between reviews, an appropriate group (i.e.: those responsible for the risk and mitigations for students) will convene to update the plan to manage them appropriately.
- Should we need to implement the SPP due to material changes being made to a course, we will communicate directly with the students by both email and advertised open fora. Course directors will also arrange to meet with students affected by such changes to discuss options either in person or via video call technology. The minimum notice period we will give students when we need to make material changes to their course is 12 months (for major course changes) or three months (for minor course changes).
- If we need to implement the measures in the SPP, academic tutors, course directors and Advice Centre staff will provide support and advice for affected students both individually and collectively and we will ensure that the RVC Students' Union has appropriate resources to provide external independent advice.
- Should students wish to complain about the implementation of the SPP, they will be able to do so through the RVC's complaints resolution procedure.