



St George's, University of London Student Protection Plan



Information and document control

Provider's name: St. George's Hospital Medical School, which carries out its activities as St. George's, University of London (herein referred to as "SGUL")

Provider's UKPRN: 10007782

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Current students may also wish to seek advice from their Personal Tutor about this Student Protection Plan

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Introduction

Why do we have a Student Protection Plan?

1. All Higher Education Providers are required to have in force a student protection plan which has been approved by the Office for Students ('OfS').
2. This Student Protection Plan ('the Plan') is intended to provide assurance to our current and future students, as well as the OfS, that we (St. George's, University of London ('SGUL')) have in place the appropriate arrangements to protect the quality and continuation of study for our students.
3. As a normal part of our day-to-day operations, we continuously monitor our strategic risks (what could go wrong in SGUL's specific circumstances) and many of these relate to things that could affect the continuation of study for our students and so they have to be carefully considered. The impact of these range from the very extreme and highly unlikely scenario of SGUL having to cease operating, to SGUL being unable to provide a particular component of a programme, which is more likely, but has less impact.
4. Our CORE values are Commitment, Openness, Respect and Engagement. We are, therefore, fully committed to ensuring that all of our students, regardless of background, thrive at SGUL and take the need to protect our students very seriously. After reading the Plan, you will understand:
 - the range of risks to the continuation of your studies, how these risks differ based on your individual needs, characteristics and circumstances, and the likelihood that these risks will crystallise;
 - the measures that we have put in place to mitigate the risks that are reasonably likely to crystallise;
 - information about the policy we have in place to refund tuition fees and other relevant costs in the event that we are unable to preserve continuation of study;
 - and how we communicate the student protection plan with students.

Who does the Plan apply to?

5. The Plan covers all students who are currently registered on a programme awarded by St George's, University of London (SGUL). This includes relevant students in the Faculty of Health, Social Care and Education and students at the University of Nicosia in Cyprus who are registered for the degrees of Bachelor of Medicine, Bachelor of Surgery (MBBS) under a franchise agreement with SGUL. Students in the Faculty of Health, Social Care and Education studying programmes awarded by Kingston University, should refer to the Kingston University Student Protection Plan.
6. The Plan also gives assurance to future students about how we have assessed and mitigated, where required, any risks to continuation of study so they can join the SGUL community safe in the knowledge that we will ensure their continuity of study.

Assessment of Risk

7. Below is an assessment of the range of risks that we perceive to be particularly relevant to the continuation of study for our students, how these risks will differ based on the different needs of our student and an assessment of how likely we think the risks will crystallise:

A going-concern

8. When looking at the SGUL as a whole, we assess it to be **very unlikely** that SGUL will no longer be able to operate, decide to cease operating, or that we would lose the power to award degrees. This scenario would have big impact and affect all students. We are the second oldest medical school in the United Kingdom and trace our heritage back to 1733. We are financially sustainable (see below) and ambitious for our future and are working towards delivering our strategic plan 2017-22, which will allow us to achieve our vision of improving health through inspiring education and focussed research.
9. We are one of five medical schools in London and whilst there is healthy competition between medical schools in London we are the only one (and indeed in the UK) that is solely dedicated to medicine, healthcare and science and we are unique in sharing our site with an acute Hospital, St George's University Hospitals NHS Foundation Trust. The integration of patients, healthcare workers, students and scientists creates a vibrant and dynamic environment that is unique and students are immersed in this from day one. Being in Tooting, London, we are both part of a global city and a thriving local community. We take pride in our location – in our links with the local community, including its schools; in the employment opportunities we bring; and in its diversity. We consider that our geographic location and our status is **very unlikely** to have a negative effect on our ability to operate successfully.
10. The risk of SGUL failing to ensure the financial sustainability needed for our students' continuation of study is **unlikely**. This is mitigated by our detailed annual budgeting process delivering surplus in line with the long-term financial plan as well as regular reporting and forecasting with academic and professional staff regularly meeting finance managers to review variances. We plan to deliver operational and cash surpluses over the medium to long term with sufficient liquidity to deliver day to day activities. Long term plans are sent to the Office for Students (OfS) and no challenge has been received. In addition, financial management and controls are overseen by council and subject to internal audit. Our externally audited financial statements for the past nine years are available on our [website](#).
11. The Office for Students (OfS) is the government-approved regulatory and competition authority for the higher education sector in England from 1 April 2018. Prior to this the Higher Education Funding Council for England (HEFCE) undertook a similar role and required all providers to undertake an annual accountability return which assessed

financial sustainability and good management and governance. St. George's, University of London's (SGUL) latest rating is 'not at higher risk', which is the highest level of assurance HEFCE provided. In April 2018, the OfS visited SGUL to undertake an Assurance Visit. These are routinely undertaken every 5 years and SGUL was given the statement of "we are able to place reliance on the accountability information" which, again, is the highest level of assurance available as a result of the OfS' visit. This provides further evidence to suggest it is **very unlikely** that SGUL will fail due to poor management, governance or not being financially sustainable.

Business continuity

12. SGUL has a robust business continuity plan to respond to any incident which causes or may cause interruption to the normal operations of SGUL, and that could potentially affect the continuity of study. Such incidents could include involving (a) Building infrastructure (e.g. power, water); (b) Staff and Students (e.g. travel disruption, bad weather, flu pandemic); (c) Systems, networks, data or Information services; (d) Loss or inaccessibility of premises (including Halls of Residence); and NHS Trust Major Incidents that could have an impact on teaching. We think these scenarios are **unlikely** to crystallise.
13. Key elements of our Business Continuity Plans include: (1) Emergency Response Plans (e.g. fire and evacuation plans); (2) Crisis Management Team Plans; (3) Institute, Faculty and Departmental Recovery Plans; (4) Emergency Communications Procedures; (5) Media/PR Communications Strategies; (6) Information Services Recovery Plans; (7) Alternative Premises Strategies; and, (8) Integration with St George's University Hospitals NHS Trust, National Blood Service and Kingston University (Joint Faculty) plans. One of the key communication methods in the event of a major disruptive event is the Emergency Message Line that staff and students can call to get key messages from management on the incident and any revised working arrangements and arrangements to ensure students know how we will be mitigating and preserving the continuity of their studies as far as possible in the meantime. We have an agreement with Kingston University that allows us to use some of their facilities in such circumstances. We will be cognisant of the individual needs of students when making decisions about how best they can continue their studies. For example, some students may be unable to travel to Kingston (due to caring responsibilities, for example).

Degree-awarding powers

14. A constituent college of the University of London since 1836, SGUL has traditionally awarded University of London degrees. The Privy Council awarded SGUL taught and research degree awarding powers in its own right in 2009 and all students commencing studies from 1 September 2012 are awarded SGUL degrees. It is, therefore, **very unlikely** that SGUL will lose its power to award degrees.

15. The University of London Act 2018 paves the way for St George's, University of London to have official University status. Note, this will not affect SGUL's ability to award degrees.

Academic Quality

16. We have a well-established process for developing, reviewing and approving the academic and business cases for new programme proposals to ensure that they are aligned to our strategy and that they are financially viable before we validate (a process which assures the quality and standards of new programmes) them. The validation process is outlined in the [Quality Manual](#). All validated programmes must be reviewed from time to time and Programmes will normally be reviewed at least once every five years (Periodic Review) to ensure that we continue to be assured of the high teaching quality and academic standards we expect of SGUL programmes.
17. The periodic review process considers all aspects of teaching quality and academic standards. It also confirms that programmes are supported by adequate physical and human resources. Details of current period reviews are available [here](#). It is **unlikely** that a programme will not be validated or pass its periodic review. If there are any issues with a programme or programmes, it will be picked up and dealt with as part of Annual Programme Monitoring (which is the year-on-year process by which the staff who have responsibility for the delivery of a programme evaluate the effectiveness of the programme in achieving its stated aims, and the success of students in attaining the programme's learning outcomes).
18. One of our main strategic objectives is to continue to invest in a high-quality physical and virtual infrastructure and each year we have an estates capital programme to ensure this. Over the past few years, students will have seen improvements in renovating teaching space, lecture theatres, teaching facilities and social space, such as the Students' Union. We are also in the process of having an estates masterplan approved that will see the creation of additional teaching space, collaboration space and will give SGUL the identity it deserves. We, therefore, consider it **unlikely** that our estate will not be fit for purpose.

Professional, Statutory, and Regulatory Bodies

19. SGUL is a distinctive higher education provider in that we focus solely on healthcare sciences, the bio-sciences and medicine, with many of our programmes leading to professional registration. At the level of the professional programme, SGUL has two main regulators: the General Medical Council (GMC) and the Health and Care Professionals Council (HCPC). The loss of accreditation from these, or other Professional, Statutory, and Regulatory Bodies would be a significant risk our students' continuation of study, however we assess the likelihood of losing our accreditation to be **unlikely**. We have well established quality assurance processes and the regulators regularly undertake their own quality assurance exercises via monitoring and visits.

20. The Office for Students (OfS) is the new regulator for the Higher Education Sector. The OfS aims to ensure that every student, whatever their background, has a fulfilling experience of higher education that enriches their lives and careers. Their work covers all students whether undergraduate or postgraduate, national or international, young or mature, full-time or part-time, studying on a campus or by distance learning. SGUL has applied to be on the OfS Register of Providers in the 'approved (fee cap)' category and to do this has to meet initial conditions of registration. Following registration, SGUL will have to meet on-going conditions of registration. Not being on the register and not achieving 'approved (fee cap)' status would have a significant impact on SGUL. We think this is **very unlikely** as we consider that we meet all of the conditions. We are also very passionate about ensuring that our students and indeed our whole community thrives and this and our [education and students section of our strategy](#), launched in May 2017, is very well aligned with the expectations of the OfS.

Clinical Placements

21. Many of the degree programmes offered by SGUL rely on the provision of clinical placements so that our students can undertake their practical training. A loss of all student placements would have significant impact our students' continuation of study, however we assess the likelihood of this occurring to be **unlikely**. It is **possible**, however, that from time to time placement providers decide not to take students or change the placements available, by either increasing, decreasing or offering different specialities. It is also **possible** that occasionally NHS regulators may identify problems with the quality of clinical care or postgraduate training that would lead us to temporarily remove UG students from a clinical site pending remedial actions by the site.

22. In March 2018, HEFCE introduced 1500 new medical school places over three years to existing and proposed new medical schools. The majority of these places went to institutions outside of London and so will have no impact on our placement availability. The process of applying for additional placements identified additional placements available to SGUL that will now not be taken up. This provides comfort to SGUL that there is resilience in the placement system should one placement provider fail. Most clinical placement providers receive payment for teaching students, so as well as supporting education, they are able to earn additional income.

Our Programmes

23. Our portfolio of undergraduate programmes is longstanding and well-established. Our undergraduate programmes are not at risk and we have no plans to close any of them, however it is **possible** from time to time it may be necessary discontinue a programme. If that is the case, the needs of continuing students will be our overriding priority and we will look to "teach out" the current students wherever possible.

24. We also offer a small number of specialist postgraduate programmes. Periodically, we refresh our postgraduate portfolio to ensure that our programmes are relevant to

providing outstanding education, up-to-date and attractive to potential students. Through this process, we occasionally withdraw a programme that is no longer viable. The shorter duration of our postgraduate programmes and small cohort sizes allows us to manage the programme closure process quickly and efficiently and without disruption to students. It is also **possible** that we will make changes to our postgraduate portfolio. For example, we are in the process of expanding our postgraduate education portfolio and developing new programmes, such as our new MRes in Translational Medicine which began in 2018-19.

25. It is also **possible** that within programmes, we may decide to make changes to the content or mode of delivery of programmes or modules to ensure our programmes remain up-to-date, attractive to students, aligned to the requirements of any relevant professional or statutory body and/ or the needs of the healthcare sector or industry. See below for how we would mitigate this to preserve continuation of study.
26. We do not have any programmes that are dependent on one individual, so it is **very unlikely** that a programme would cease due to not having appropriate members of staff. We benefit from a high quality and committed academic workforce who would be able to ensure all programmes are covered. Specialist expertise exists across our extensive healthcare networks.

Student recruitment

27. It is **unlikely** that we will be unable to recruit enough undergraduate students to our programmes to make them feasible. In the last couple of recruitment cycles, the removal of NHS bursaries has had a negative impact on the recruitment to some of our healthcare programmes (e.g. Nursing), but this has not been enough to have an impact on the feasibility. Our programmes are popular in clearing and adjustment and high-quality students are able to be recruited.
28. It is **possible** that some postgraduate programmes will not recruit enough students. Where this is repeatedly the case, and as we look at developing and expanding our postgraduate provision, we may decide to discontinue a particular programme or modify a particular element of the programme. See below for how we would mitigate this to preserve continuation of study.
29. St George's has held a Tier 4 licence since the 23rd February 2009, this licence is not due to be renewed until March 2021. St George's has applied for and successfully passed the annual Basic Compliance Assessment (BCA) each year since. On this basis, it is **unlikely** that St George's will lose its Tier 4 licence.
30. Compliance activities take place at all stages of the student lifecycle: admissions (immigration history checks, time limit on study, academic progression etc.); at registration (enrolment, record keeping etc.); during study for the compliance of the tracking of students (attendance, work placements etc.); and for student reporting (withdrawals, IOS, changes in circumstances).

31. We have an established collaboration with the University of Nicosia (UNic) that allows UNic to deliver our MBBS programme under a franchise agreement. Under the agreement UNic students are able to register for an SGUL academic award. The SGUL-UNic collaboration is underpinned by a long term legally-binding agreement which is evidence of our shared commitment to the value of the partnership. It is **very unlikely** that either SGUL or the University of Nicosia would decide to withdraw from the partnership. If that were the case, the agreement requires both parties to work constructively to ensure that all students will be supported fully until they have completed the programme.
32. We are permitted by the General Medical Council to award UK primary medical qualifications (PMQs). This means that all SGUL MBBS graduates including those that complete the MBBS under the franchise agreement with UNic are eligible to apply for provisional registration with the GMC. As a consequence, the franchise agreement has been subject in full to all GMC quality assurance processes. In the **very unlikely** event that we were to lose our entitlement from the GMC to award PMQs, we would agree an appropriate teach-out strategy with the GMC for all students including those students registered under the franchise agreement. Specifically, we will support the University of Nicosia in finding an alternative franchise partner or arrange for students to continue their studies at a different provider. In all cases, we would take into account the individual needs of each student. For example, a student's nationality may have an impact on where s/he study.
33. Under the Franchise Agreement, UNic is required to let us know in good time if any issues arise which may prevent the UNic from delivering the MBBS to the high standard we expect. These issues might include matters related to its financial sustainability and its standing with the relevant governmental and regulatory authorities in Cyprus. It is **very unlikely** that issues of this kind will occur. If that were the case, we would put in place a framework to enable students to complete the programme in Cyprus or elsewhere.

Measures to preserve Continuation of Study

34. This section of the Student Protection Plan explains the measures we have put in place to mitigate the risks that we consider reasonably likely to crystallise – these are the risks categorised as **possible**. This is intended to give you, as students, assurance that we have considered carefully how we will ensure your continuation of study is preserved:

Placement Providers

35. We benefit from agreements with 19 clinical sites and 200 GP practices. We have a varied pool of placement providers, (such as a range of different types of NHS Trusts and independent placement providers such as GP surgeries and care homes) not just

in London but spread across the South of England. This greatly **reduces the impact** in the scenario of losing one placement provider and significantly **reduces the likelihood** of all placements being lost as there are many providers to call on. It provides a pool of alternative providers to contact should we be in the position of needing additional clinical placements. The recent increase in medical school numbers and introduction of new medical schools will not affect our ability to provide placements.

Our Programmes and student recruitment

36. We are dedicated to ensuring that all of our students, regardless of background, thrive at SGUL. Should we take the decision to close a programme, for whatever reason, our first priority are the students. We will ensure that we 'teach out' (ensure that students complete the programme that they are on) students that are currently registered on that programme. Where this is not possible or preferable (in the unlikely event a programme has to be closed for reasons of poor quality) we will support our students to find an alternative institution at which they can continue to thrive. We have explained how this might work below, giving a recent example.
37. We have a procedure for closure of programmes with authority to discontinue a programme resting with the Principal, who will take advice from Senate and/ or our Executive Board as appropriate. Applications to discontinue a programme may be initiated by the Institute Director offering the programme. In all cases the formal Programme Closure Form will be used and reference will be made to our [Quality Manual](#) on good practice in programme closure.
38. An example of implementation of this procedure, is our strategic decision in 2017 to close our international medicine programme to new applicants. We are managing the closure of the programme by means of a comprehensive teach out plan. The plan is our guarantee to students that all resources will remain in place to ensure that they receive a high quality experience through to graduation. The teach out plan runs to 2023-24 to ensure that students whose progress may be delayed, for example due to temporary ill health or other mitigating factors, are nonetheless able to complete their study.
39. We recognise that each student has different requirements. In this example, during the teach-out phase, we are working closely with students to ensure that we are responsive to any concerns that they might have. In this example, the Dean of International Education, who has responsibility for the international programme has been working closely and meeting regularly with the students affected to ensure their needs are met to each of their specific scenarios (for example, students were asked to let us know whether they would like to undertake clinical placements in the US or the UK).
40. Should we no longer be able to continue to provide a programme and teach out the current students, we would offer the affected students alternative available programmes from our portfolio (for which they meet the entry criteria), recognising that

these alternative programmes may not be appropriate for all students, for example if they wish only to study a particular programme. In the instance where the alternative proposed study at SGUL is not reasonably appropriate for the student, we will support and assist them in transferring to an alternative institution at which to continue their studies (though they would have to meet the entry criteria). Where there are commissioned programmes (such as our Paramedic Programme available to the South East Coast Ambulance Service) or programmes that are capped (such as MBBS), we would have to liaise with the relevant commissioning group (such as Healthcare Education England) and the relevant regulator (such as the GMC) to ensure appropriate permissions are sought to facilitate transfer to alternative providers. Indeed, the regulatory element would be advantageous as regulated programmes will have the same outcomes. We would ensure that we bear the Competition and Markets Authority and Consumer Protection Law in mind when implementing any scenario. These measures will **reduce the impact** of closure of programmes on the student's continuity of study.

41. When we make changes to programmes we will do so with Consumer Protection Law in mind and will ensure that students receive sufficient and appropriate notice of any changes and that changes and the rationale will be explained carefully to the students. It is likely that any change will be for positive enhancement reasons. This will greatly **reduce the impact** of the change on students.
42. We recognise that different students have different requirements and we commit to tailor our measures and support wherever reasonable, in order to ensure continuation of study. For example, where a student may have mitigating circumstances that limit their ability to attend an alternative HE provider or alternative placement site (such as parental or caring responsibilities), the usual processes for placement allocation would be followed so that these students are prioritised. In making any changes, we will take into account individual needs of students, which might be protected characteristics (such as reasonable adjustments for students with disabilities).
43. Where we are unable to preserve a students' continuation of study, we would enact our Tuition Fee Policy and Refund and Compensation Policy which are in place to make clear guidance around refund of tuition fees and other relevant costs to students and provide compensation where appropriate. This will **reduce the financial impact** for the student. See below for further details.

Refunds and Compensation

44. We have a [Refund and Compensation Policy](#) and [Tuition Fee Policy](#), which outlines the circumstances in which refunds and compensation will be considered in the unlikely event that we are unable to preserve continuation of your study.
45. If you are reading this as an applicant, the Refund and Compensation Policy also outlines how we will support you should we have to terminate a programme on which applicants have been offered and have accepted a place.

46. Our financial statement sets out our financial reserves. In our assessment this demonstrates that SGUL has adequate cash reserves to deliver the financial implications of our Refund and Compensation Policy, should we need to deliver on this.

Individual needs and welfare support

47. At SGUL, we pride ourselves on our student support services, which serve our wonderfully diverse student body. We are proud to attract and inspire students nationally and internationally who will thrive on our programmes, regardless of background, or protected characteristics such as disability, race, religion or belief, or sexual orientation. In the event of our Student Protection Plan being enacted, we will explicitly take into account the possible different needs of different students, such as those with protected characteristics and those from different backgrounds.
48. All students are given access to all of our support services and if there is any risk to continuation of study, students will be reminded and 'signposted' to relevant student services, including our Counselling Service, and to services offered by the Students' Union. We will also ensure that all affected student's Personal Tutors are fully briefed too so that bespoke, tailored, support can be provided to each and every student. This will also be emphasised through appropriate methods of communication as outlined below. Full details of our services can be found on our website.

Communication and Review of this Student Protection Plan

49. This student protection plan is published on the SGUL [website](#) and as such is available to current and future students, staff and members of the public. We will also include the Plan with the material we provide to applicants when we make offers to study on a programme. It is also provided upon enrolment and induction for new students. Current students will be made aware of the Plan at the start of each academic year.
50. The Plan is a live document and will be routinely reviewed which will be at least on an annual basis, prior to the start of each academic year, through our established governance process which already includes involvement from students. The Students' Union will be consulted as part of this outside of the governance process. Following each review, the revised plan will be submitted for approval by Council, within which there is student representation, providing further opportunity for student input and confirming approval. This current plan has been approved by Council, and independently by our Students' Union President.
51. Should measures in the plan need to be triggered, this would be communicated to the affected students within 10 working days of the decision to trigger the plan being made.
52. The communications would be in a variety of forms (e.g. town hall meetings, emails and one-to-one meetings to discuss individual needs) and points of contact established in order to ensure that all students could engage with the process and receive

information, advice and guidance. Additionally, all students have access to, and are members of, St. George's Students Union, which is a wholly independent registered charity who can provide independent advice to our students.

53. Should a student wish to make a complaint about our implementation of this student protection plan, they should follow our student complaints procedure, as set out on our [website](#).
54. We will also ensure the Plan is shared with staff and Personal Tutors will be briefed specifically as they will be best placed to support each student individually. This will be available on the policy section of the website and will be cross-referenced to as appropriate from other policies. We will ensure that the Plan is brought to the attention of relevant colleagues as part of the induction process. The Plan will be publicised to staff via 'George's Weekly' our internal staff newsletter.