

University Campus of Football Business Limited
Student Protection Plan

Provider's name: **University Campus of Football Business Limited**

Provider's UKPRN: **10043164**

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1. Introduction

The University Campus of Football Business Limited (**UCFB**) delivers football and sports focused undergraduate and postgraduate degrees across a range of areas including business, media and coaching. Degrees have been delivered in collaboration with Buckinghamshire New University ('BNU') since 2011. In September 2020, UCFB entered into a new validation agreement with the University of East London ('UEL') and is considered to be a College of UEL. As a result of this, UCFB is now in the teach-out phase of its relationship with BNU.

UCFB and its global brand for postgraduate courses, the Global Institute of Sport ("**GIS**"), is an established specialist provider of higher education within the football and sports industries with two permanent UK campuses, in North London and Manchester. 2022 saw the successful launch of two new sites for delivery in Miami and Melbourne. The use of iconic stadia plays a central role in attracting students and providing immersive courses within the sports industry.

Courses delivered by UCFB/GIS reflect the needs of the sports industry and provide graduates with the skills, knowledge and behaviours required to meet industry demands. The knowledge skills and behaviours are developed through a curriculum that embeds industry insight into the development, delivery, and assessment of courses.

2. The Student Protection Plan (SPP)

All universities and colleges registered with the Office for Students ("**OfS**") publish a student protection plan ("**SPP**"). The SPP sets out what students can expect to happen should a course, campus, or institution close. The purpose of a plan is to ensure that students can continue and complete their studies or can be compensated if this is not possible. The plan also describes other specific risks to the continuation of study and the measures to address these in a proportionate way.

As a college of UEL, all UCFB/GIS students are subject to the University of East London's SPP¹. In addition, UCFB/GIS has conducted its own assessment of risk to continuation of study, to ensure that current and future UCFB/GIS students are protected in the event of material changes to its operations.

In conducting this risk assessment, UCFB has identified the following key risks that would affect the quality and/or continuation of study, if they crystallised:

¹ Similarly, UCFB students who are studying on programmes validated by BNU (currently going through 'teach out') will be subject to the BNU Student Protection Plan.

- The closure of UCFB as an institution
- Closure of a specific facility without a suitable alternative available
- Loss of access to critical infrastructure
- The loss of key members of staff
- UCFB's validation arrangements being terminated or not renewed
- Discontinuation of a course, campus of study or mode of delivery of a course
- Loss or suspension of OfS registration
- Sale of UCFB

3. Executing the Student Protection Plan

Should an event occur that requires the SPP to be executed, UCFB and its Executive Leadership Team will:

- Be open about the event arising.
- Work with the Student Support team and Students' Union to consult with affected students, to gain a complete understanding of how the proposed mitigation measures could affect them and what solutions are appropriate.
- Fully consider the impact on affected students before deciding to make a significant change.
- Make every effort to ensure that students can continue their studies with UCFB/GIS (via another mode of delivery or campus) or at a suitable alternative provider.
- Remind students of the provisions in this SPP and their rights under consumer law.
- Provide a refund or compensation if we are unable to provide a solution that works for students.

4. Communication

To ensure the SPP is effectively communicated to students and applicants, UCFB will publish the SPP on its website. It will be signposted to returning students as part of their re-induction and will be available through the Students' Union to enable students to access it if required.

A copy of the SPP will be made available on the UCFB staff intranet and staff and student representatives will have an opportunity to contribute to future revisions of the SPP through UCFB's academic committee structure.

5. Refunds and Compensation

UCFB's Refund and Compensation Statement (available [here](#)) outlines the circumstances in which UCFB will refund tuition fees and other relevant costs to students if we are no longer able to preserve continuation of study. UCFB is currently operating under its validating partners' Refund and Compensation policies, which are referenced in UCFB's Refund and Compensation Statement and via the validating partners' websites.

Refunds and compensation are also referenced in the Student Terms and Conditions which can be found on UCFB's website [here](#).

6. Complaints

Students may make a complaint through the UCFB Complaints and Appeals process in the event of an issue arising about the way that UCFB applies this Student Protection Plan. The process is available on the UCFB website [here](#).

7. Reviews and revisions of the SPP

This SPP will be reviewed on an annual basis to ensure that the risk assessment remains current, and the mitigating measures remain practicable, relevant and effective. Future

revisions to this version will be carried out in consultation with students via the Education and Student Experience Committee ('ESEC') to ensure that their views, interests and needs are taken into account.

8. Risk assessment and scoring

This SPP sets out an assessment of a range of risks identified to the continuation of study for UCFB's students

The impact and likelihood that the risks will crystallise is outlined along with measures that UCFB has put in place to mitigate the risks.

We have estimated the likelihood that each risk will crystallise based on the following scale:

- **Unlikely** - less than 20%
- **Possible** - 20%-49%
- **Likely** - 50% to 89%
- **Almost certain** - 90% - 100%

We have estimated the impact of each risk based on the following scale:

- **Low** - isolated or limited disruption to staff and/or students and/or temporary (less than 2 days) loss of limited resources
- **Medium** - moderate disruption to staff and/or students and/or loss of resources over a period of more than 2 days
- **High** - significant disruption to staff and/or students and/or loss of a number of key resources for more than 1 week.
- **Very high** - severe and prolonged disruption to staff and/or students and/or loss of a number of key resources which continues for more than 1 month.

9. Risk Analysis

Risk 1	Likelihood	Impact
That the institution will cease to operate	Unlikely	Very High

Assessment

The risk that UCFB could cease to operate is unlikely - UCFB is a growing institution, increasing in maturity, new campuses, and new student numbers.

UCFB has a range of financial controls in place, including detailed annual budgets and a five-year financial plan with appropriate stress testing. These budgets and plans are developed by the UCFB Finance department, a team with many years' experience of successful financial management in the higher education sector. They are reviewed and approved by the UCFB Board. Financial planning is also subject to annual audit, with the outcomes reviewed by the UCFB Board. UCFB also publishes its audited annual report and financial statements.

These financial plans are in turn used to support growth plans and forecasting for appropriate investment into the development of the institution. With increasing institutional maturation, the forecasts become stronger.

The Executive Leadership Team ('ELT')² regularly reviews the financial plans and refreshes expectations as a result of projections, continuous improvement and ambitions for growth.

The Academic Board oversees policies, processes, and procedures to uphold the standards of a higher education institution, ensuring the student experience and academic standards are as expected.

A Risk Management Framework enables each area of the institution to monitor its changing risk profile and act against circumstances which might cause possible issues with our sustainability and the quality of the provision we offer. Quarterly updates, led by the Executive Leadership Team provide insight into the institution's changing risk landscape.

Impact

The impact of this risk if it were to crystallise is assessed to be Very High. Students would need to be transferred to an alternative provider to continue their studies and to protect the learning that has already taken place.

Mitigation

In the unlikely event of closure, UCFB would:

- Make every effort to ensure that students can continue their studies by entering a 'teach out' period. As validating partner, UEL (and BNU if relevant) would ensure that students receive academic credit for their study. UCFB would work with UEL to co-ordinate continuity of service if possible.
- Work initially with UEL and then with other higher education providers to identify suitable courses which students could transfer to, using academic credits to transfer to the new institution. Support for such 'transfer of study' would include certification of credit or a record of academic achievement to facilitate admission to the receiving provider.
- Work closely with students to ensure that their needs are carefully considered, and appropriate measures are selected for them.
- During the teach-out period, and if appropriate and relevant to the circumstances of closure, UCFB would work to identify a suitable buyer for the organisation.
- In the event that no other suitable options are available, would seek to offer refunds or compensation for students, in line with UCFB's Refund and Compensation Statement.
- Ensure that arrangements are in place to enable students to access evidence of their academic achievements in the future.
- Notify the OfS of the reportable event.

² The UCFB ELT is made up of the senior leaders in the UCFB business, including the President of GIS, Executive, Academic and Faculty Deans and the Director of Finance and Chief Operating Officer, both of whom are qualified accountants.

Risk 2	Likelihood	Impact
Closure of a specific facility without a suitable alternative available	Unlikely	High

Assessment

UCFB operates across a range of facilities at sites in Manchester and London and more recently in Miami and Melbourne. These facilities are largely leased (some are licenced) for delivery of the courses.

Contracts for all leased and licensed premises are tightly controlled and regularly reviewed by the Director of Property and Facilities to ensure facility capacity and commercial terms and conditions are fit for purpose. UCFB has early discussions in relation to the renewal of leases, which take place well in advance of contract end dates. As such, the risk that a facility will close is viewed as unlikely.

Impact

The impact of the risk is assessed to be high – students would potentially need to transfer to another suitable facility at a different location. If specialist facilities close, then this may have a significant impact upon students’ ability to complete their course.

Mitigation

In the unlikely event of a closure of a specific facility, UCFB would:

- Use its close connections with the sports industry, local and regional councils and national sports governing bodies to secure additional facilities to grow and/or identify and secure alternative facilities. UCFB already has strong capital project management experience of implementing new and relocating existing facilities.
- Offer the opportunity to students to transfer to one of its other campuses. The benefit of having a network of campuses is that there are other choices for students.
- Work with UEL and potentially other higher education providers to identify suitable courses which students could potentially transfer to, using the credits they have gained for their studies whilst at UCFB. Support for such ‘transfer of study’ would include certification of credit or a record of academic achievement to facilitate admission to the receiving provider.
- Offer refunds or compensation for students who were unable to transfer to another course of their choosing for tuition fees in respect of undelivered course provision and in line with UCFB’s Refund and Compensation Statement.

If it is not possible to continue operating in a particular country due to facilities becoming unavailable or other travel/security risks, courses would be reconfigured as online courses (with appropriate student input and consent) with tutorial support from staff based in the UK. UCFB has a number of master’s courses operating either wholly online or with a mix of online and on-campus learning. This experience of teaching and learning and student support will ensure a smooth transfer in the event the risk materialises in this way.

Risk 3	Likelihood	Impact
That the institution loses access to critical infrastructure	Unlikely	High

Assessment

UCFBs critical infrastructure comprises of its buildings and facilities (and the access to them) as well as core IT infrastructure which enables facilities operation, teaching and student learning. There are a number of risks to the availability of critical infrastructure of this nature. These include (but are not limited to) fire, flood, a terrorist event and a public health event. Critical IT infrastructure is at risk from cyber threats such as ransomware, denial of service attacks and actions resulting in data theft or loss.

UCFB maintains a full set of business continuity arrangements, including a Business Continuity plan. This plan outlines what UCFB will do if there is a risk to critical infrastructure or services. The plan is prepared jointly by the UCFB Property and Facilities Management function and IT functions and is updated on an annual basis. Business Continuity testing is also part of this planning.

The UCFB IT function maintains recovery, continuity and response plans for business-critical systems and services - which can be implemented, depending on the nature of the unplanned event. It also operates a comprehensive plan of preventative maintenance for IT systems and services.

UCFB maintains a Business Interruption Insurance policy to mitigate the costs associated with unplanned events that disrupt business and institutional operation.

Impact

The impact of the risk is assessed to be high, as (in the worst-case scenario) study would be disrupted. For events involving physical infrastructure, students may need to transfer to alternative facilities, or even another provider with suitable facilities, which would disrupt the student experience. For courses where specialist facilities are needed, students may not be able to complete a particular course.

Mitigation

In the event of a loss of access to critical infrastructure, and depending on the nature of the event, UCFB would:

- Execute its Business Continuity plan, executing the emergency response and management procedures that are relevant to the unplanned event. This would include ongoing communication with all students, staff, third parties and other stakeholders affected.
- Execute its IT recovery, continuity and response plans for relevant business-critical systems and services.
- Enact its Business Interruption Insurance policy to mitigate the costs associated with the unplanned event and its disruption to business and institutional operation.
- Work with UEL to take all reasonable steps to ensure that students can access services at suitable nearby locations, if needed. Such locations may be on the same campus, a different campus or off campus.
- If appropriate, direct students to UCFB's Refund and Compensation statement if they incur additional expenses as a result of disruption caused by the event.

In the event of a prolonged or permanent loss to a facility or building, then the measures described in response to Risk 2 would also potentially be implemented.

Risk 4	Likelihood	Impact
Loss of key members of staff	Possible	Low

Assessment

UCFB operates a flexible staffing structure for each programme, comprising of course leaders, module leaders, tutors and visiting expert lecturers, resulting in contingency of teaching capacity in the event of illness or unplanned leave.

UCFB also operates a staff planning cycle aligned to its budgets and student number forecasts. UCFB undertakes an annual planning exercise linked to student number forecasts and longer-term planning linked to module and course development.

The Executive Leadership Team (ELT) is also responsible for checking resource plans to ensure physical, technological and human resources are in place to deliver all courses. Academic teaching teams co-develop and share delivery of modules where possible to share expertise and minimise single points of failure.

All staff have notice periods stipulated in their contracts of employment. In the event that a member of staff chooses to leave UCFB, the prescribed notice period enables UCFB to recruit a suitable replacement. The UCFB HR function operate UCFB's recruitment process and work closely with the relevant academic and line managers to recruit a suitable replacement.

Impact

Whilst it is possible that UCFB will lose key members of staff as part of natural turnover, it is unlikely that that this would adversely impact students continuing and completing their studies, so the impact is considered to be low.

Mitigation

In the event of a loss of key members of staff, UCFB would:

- Enact its HR policies relating to leavers - working closely with outgoing staff to establish exit timescales, any required handover work and other appropriate exit activity.
- Assess the impact upon students and draw up plans to utilise contingency teaching/resource capacity, if required.
- Communicate to students about upcoming changes in staffing, what action is being taken in response to this and how this may affect them.
- Enact its recruitment process to hire a suitably qualified and experienced replacement.

Risk 5	Likelihood	Impact
That UCFB's validation arrangements are not renewed or are terminated	Unlikely	Medium

Assessment

UCFB entered into a new validation agreement with UEL in September 2020. Since then, both institutions have worked together, developing a strong and productive working relationship that is mutually beneficial. Since the start of the relationship, UEL has demonstrated its confidence in UCFB through the validation of new programmes and the expansion of modes of delivery for some existing programmes.

UEL's Academic Partnerships department creates a strong link between UCFB and UEL. Regular interactions take place between senior leadership, academic and professional services staff to align UCFB's operations to UEL's academic regulations, systems and processes. Joint monthly Senior Management Team meetings are attended by each institution's senior leaders to ensure the partnership is progressing towards its strategic goals. Collaborative Annual Monitoring of academic courses facilitates and review of courses to ensure they continue to meet the standards set by UEL for academic content and student experience.

As such, the risk that validation arrangements will not be renewed, or that UEL might terminate them is assessed as being unlikely.

Impact

Impact on students would be medium, as UCFB would move to another validating institution using the transition and teach-out processes developed in the transfer from BNU to UEL in 2020. Students will be offered the choice to continue their studies with UCFB (validated by UEL) or to transfer to UCFB's new validation partner.

Mitigation

In the event that UEL indicates that it will not be renewing its validation arrangements or chooses to terminate them, UCFB would:

- Source a suitable, alternative validating partner at the earliest opportunity. UCFB has extensive prior experience of sourcing and implementing a new validating partner.
- Make every effort to ensure that students can continue their studies by entering into a teach-out period. As validating partner, UEL would ensure that students receive academic credit for their study. UCFB would work with UEL to co-ordinate continuity of service if possible.
- Give students the choice to move to another provider. In support of this, UCFB would work with other higher education providers to identify suitable courses which students could transfer to, using academic credits to transfer to the new institution. Support for such 'transfer of study' would include certification of credit or a record of academic achievement to facilitate admission to the receiving provider.
- Work closely with students to ensure that their needs are carefully considered, and appropriate measures are selected for them.
- In the event that no other suitable options are available, would seek to offer refunds or compensation for students, in line with UCFB's Refund and Compensation Statement.

Risk 6	Likelihood	Impact
Discontinuation of a course, campus of study or mode of delivery of a course	Possible	Medium

Assessment

From time to time, UCFB must decide if it is viable to continue to run a course, or a course in a particular mode of delivery or campus location. This could be due to low student numbers, poor outcomes or negative feedback. We continually review our portfolio of courses, and the likelihood of a strategically planned course closure is possible.

UCFB has developed a 3 – 5 year academic course development plan and undertakes regular student number forecasting exercises as part of annual planning, and monthly reviews by the institution’s executive leadership team. Full recruitment strategies and plans are developed to ensure activity is taking place to meet targets outlined in financial plans.

UCFB also monitors student engagement and gathers feedback at midpoint and the end of each course module. These form an input into course performance reviews. Continuing poor performance or outcomes are escalated to the Education and Student Experience Committee (“**ESEC**”)

Any decision to close or suspend recruitment of a course, mode of study or at a campus will be approved by the Programme Portfolio Committee (“**PPC**”), a sub-committee of the institution’s Academic Board. The decision will be informed by the application history and market insight and will consider the financial and legal implications (for example, UCFB’s requirements in relation to consumer law compliance). The PPC consists of academic and professional services staff, and student representatives

If UCFB decides to close a course, it will either continue to run the course for the original duration (teach-out) or implement course transfer arrangements, if a high-quality student experience cannot be guaranteed. During this period, it will not accept new students - nor will the course (or mode of delivery) be advertised. Any decision to close a course will be made prior to the relevant UCAS deadline to accept offers in order to minimise the impact on applicants.

The Marketing, Recruitment and Admissions Committee (“**MRAC**”) will approve processes for communication of the message relating to suspension or closure and the Academic Board will oversee the ongoing management of any teach-out or transfer arrangements, to ensure that academic standards and the quality of the student learning experience is properly managed.

Impact

The impact of such an event is assessed to be medium, as whilst a proportion of students or applicants would be affected (depending on whether a course, mode or campus of delivery will close), UCFB would teach-out all students as part of its commitment to delivery.

Mitigation

In the event of a closure or suspension of a course or mode of delivery for a course, UCFB would:

- Cease to market the course, mode of delivery or campus of delivery
- Depending on the timing of the decision and if appropriate, immediately contact applicants to explain the situation and provide guidance on alternative options.
- Inform all affected students and communicate to them the impact and the options available – this would include details of the teach-out of the course.
- If a high-quality student experience cannot be guaranteed, we will work with students to explore alternative options. These might include transfer to another campus, mode of delivery, another course at UCFB or to an alternative provider.
- Work closely with students to ensure that their needs are carefully considered, and appropriate measures are selected for them.
- In the event that no other suitable options are available, would seek to offer refunds or compensation for students, in line with UCFB’s Refund and Compensation Statement.

Risk 7	Likelihood	Impact
Loss or suspension of Office for Students (OfS) registration	Unlikely	Medium

Assessment

UCFB complies with the OfS regulatory framework and the conditions within it that are set out to ensure providers demonstrate that they offer high quality education. A clear mission, aims and ambitions, aligned to this framework, drives UCFB’s financial planning and the quality assurance of the operation of the institution.

Monitoring is undertaken through UCFB’s academic committee structure which reports to the UCFB Academic Board. This structure (which includes student representation via forums including the Education and Student Experience Committee) ensures not just that compliance with all regulatory standards is monitored, but that UCFB takes action to remain compliant whenever new requirements or guidance is issued by the OfS.

Sports industry stakeholders are involved in the design, development and delivery of UCFB courses to ensure they meet the needs of the industry. All courses are reviewed through a robust annual monitoring process and in-year course review process that tracks actions and the impact of intervention. External examiner feedback is reviewed, and responses are implemented within the annual monitoring action plan.

UCFB also monitors student engagement and gathers feedback at midpoint and the end of each course module for all programmes. These form an input into course performance reviews. Continuing poor performance or outcomes are escalated to the Education and Student Experience Committee (“ESEC”).

As such, it is assessed as unlikely that UCFB would lose its OfS registration or have its registration suspended.

Impact

The impact on students’ ability to continue and complete their studies is assessed as medium, because the consequences of this event are largely indirect from a student perspective. If the planned mitigation measures are implemented in a controlled way (with ongoing engagement with all affected students) then disruption will be minimised.

One of the key impacts to the UCFB as an institution would be that it would no longer have access to direct government and student funding.

Mitigation

In the event of OfS registration being suspended or removed, UCFB would:

- Take immediate steps to seek to rectify the failures giving rise to the proposal to remove UCFB from the register of providers.
- In parallel with making all reasonable attempts to remain on the register of providers, would seek to secure a contractual arrangement (including indirect funding arrangements) with another registered provider, to allow students to complete their programmes and/or reach agreement with the OfS to enable UCFB to teach-out and grant awards to its existing students.
- Work with the OfS to safeguard the interests of all students, allowing them to complete their studies in line with existing funding arrangements and receive their award.

In the event that UCFB did enter into an arrangement with a new validating partner, then the measures described in response to Risk 5 would also potentially be implemented.

Risk 8	Likelihood	Impact
Sale of UCFB	Unlikely	Low

Assessment

As a privately owned and growing institution, UCFB may become attractive to buyers. Following a sale, the corporate and academic governance structures of UCFB would unlikely change to any material extent (save that there may be some changes in board membership to reflect the new ownership) as it would need to continue to comply with the OfS' ongoing conditions of registration and maintain its registered status.

A sale of UCFB would be a reportable event under the OfS' regulatory framework and UCFB would notify the OfS of this in accordance with the regulator's requirements.

Impact

The impact of a sale of UCFB is assessed a low, as there would be negligible impact on students' ability to continue and complete their studies.

Mitigation

In the event of a sale of the business, UCFB would:

- Notify the OfS of the sale as a reportable event.
- Consult with the OfS as necessary, to ensure that UCFB continues to meet its conditions of registration as it transitions to new ownership.
- Communicate to students about the sale and how this may affect them, providing an opportunity to answer any questions and address any concerns they might have.