

Annex D: Template for a student protection plan

Provider's name: Royal Veterinary College

Provider's UKPRN: 10007779

Legal address: Royal College Street
London
United Kingdom
NW1 0TU

Contact point for enquiries about this student protection plan:

Matthew Grigson
College Secretary
RVC – Hawkshead Campus
Hawkshead Lane
North Mymms
Hertfordshire
AL9 7TA

E: mgrigson@rvc.ac.uk
T: 01707 666802

Student protection plan for the period 2021/22

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 five are considered to be unlikely and hence mitigating actions are reported in this section. Items six through 9 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 due to strong revenue growth and robust management of expenditure and has built up healthy cash reserves. Our most recent financial statements (2019/20) can be found at [Financial Statements](#). These show that, despite the adverse impact of the COVID-19 pandemic in the latter half of the financial year, a positive financial outturn was achieved and cash reserves were healthy. Our external auditors raised no “going concern” issues.

Whilst the challenges of the pandemic continued throughout 2020/21, the RVC maintained business continuity across all its activities, including the teaching and assessment of our students. By prioritising investment in digital learning and assessment resources, and in appropriate safety measures to ensure our students could undertake their clinical and practical training, all cohorts were able to achieve their learning outcomes. The projected financial outturn for the year is a small surplus which is ahead of the budgeted position. However, we may still be subject to complaints re: student dissatisfaction in relation to changed delivery as necessary due to the pandemic which may result in financial recompense if upheld; however, we consider the steps taken to mitigate student dissatisfaction and complaint, as outlined in 2.10, are robust and minimise this risk.

Following recent capital investment in teaching and learning facilities at our Camden campus, major capital works at our Hawkshead campus are progressing with the aim of providing a high quality and attractive learning environment for current and future students.

The RVC’s governing body has approved the 2021-22 budget and four-year financial forecasts which anticipate a phased return to “business as usual”. Demand for our teaching programmes remains strong both within the UK and beyond. We are mindful of the need to balance tuition fee income between regulated and unregulated fee levels and our Access and International Engagement team is focussed on diversifying our student intake to reduce reliance on any single market or region. Additionally, there is forecast growth in other areas of our business. Nevertheless, and whilst the financial impact of the pandemic has abated, there are ongoing funding pressures on the sector and, as a specialist 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 our governing body, 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
- 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 has a business continuity plan in place to deal with events ranging from a minor power outage to a complete loss of site. This plan has undergone desktop testing exercises for a range of scenarios and on each occasion outcomes have proved manageable. A further desktop exercise is scheduled for September 2021 to ensure that our plans and mitigations remain effective. The business

continuity plan is supplemented by a comprehensive risk register and proactive risk management at a range of levels within the College.

The RVC's response to the pandemic has been a real and significant test of our business continuity resilience.

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) BREXIT

We consider the immediate impact of BREXIT on current EU students is low as we are re-assured by government statements that existing students will be permitted to complete their studies and benefit from SLC support for the duration of those studies where eligible. Updates on funding eligibility are noted on Fees and Funding course study pages to ensure that new students are informed of these at an early point in course selection; these were updated with the June 2020 confirmation that EU students commencing studies in or after the 2021/22 academic year will no longer be eligible to pay the "home" rate of tuition fees. For existing students, we have created Brexit advice pages on our intranet which are reviewed and updated as government policy and deadlines are updated. We have written to all existing EU/EEA students to advise them of the need to apply to the EU Settlement Scheme and individual advice has been provided via the Advice Centre student advisors. New entrants 2021/22 have received similar advice from our Admissions team and supported with Student Route Visa applications where appropriate. We continue to monitor any impact of associated risks via our Strategic Risk Register and will adjust home and international recruitment targets to off-set any potential adverse staff/student recruitment/financial impact in the future.

3) 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. 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.

4) Loss of UKVI Tier 4 license

We consider that our 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 c£8k p.a. to ensure 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 UKVI status (including duties as a Tier 4 and Tier 5 sponsor) was completed in spring 2020 by external specialists and a further audit by KPMG to assess on-going compliance is planned for 2020/21.

5) 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 expansion of 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, is prioritised.

6) Loss of specialist teaching staff

To deliver our core programme, the BVetMed, 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.

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 is due for renewal in 2021.

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

Over the last 10 years we have invested approximately £29 million on developing campus facilities. We are currently investing in further campus development programmes to the value of £58 million over the next three years 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. Consequently, we consider the risk of disruption to student learning and/or assessment due to building works is minimal to moderate.

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 participated in the March 2018 USS dispute. 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

Whilst there remains a risk of disruption to student learning and assessment due to the COVID-19 pandemic this has somewhat reduced both in terms of likelihood and impact. However, it remains unclear whether restrictions associated with the pandemic will continue into 2021/22; we therefore consider the risk of disruption to student learning and/or assessment to be high.

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 counter measures, to the wide range of random phishing and sophisticated targeted cyber security attacks taking place on a daily basis.

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 very 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

6) 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. 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, extensive clinical research opportunities and opportunities to work within comparative biomedical research groups and working 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.

7) 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 fully anticipate continuing our partnership with the College of Animal Welfare that currently provides these placements but should the contract not be renewed in 2021, the RVC would develop its own portfolio of Training Practices and provide the administrative resources required by utilising financial resources currently allocated to CAW. These would be used to expand and train the RVC's BVetMed placement team as well as the development of supporting IT and other systems.

8) 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 Fees Policy 2021/22 please visit <https://www.rvc.ac.uk/about/the-rvc/academic-quality-regulations-procedures#panel-general> for further information. 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 Echo 360/Panopto and the availability of additional learning materials in our VLE. Where exams may be compromised by building works we will re-locate them or deliver them as online exams which may be proctored. If exams are re-located, this may be to a different RVC building or campus. We will also utilise external but local venues with whom we already contract – for example the London Irish Centre (Camden). Additional travel costs associated with any move of exams will be met by RVC in line with our "Student Fees Policy 2020/21" policy (see link above). Additional support or concessions for students with disabilities will be considered on an individual basis related to need.

9) 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. Academic Registry monitor sessions and activities affected by strike action and for lectures ensure that previous learning materials (Echo 360/Panopto lecture recordings, PowerPoint presentations etc.) are available for students as soon as possible. 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 "Student Fees Policy 2021/22" – please see <https://www.rvc.ac.uk/about/the-rvc/academic-quality-regulations-procedures#panel-general>. 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 as utilised during the 2019/20 summer term examinations affected by coronavirus/COVID-19 and 2020/21 remote assessments. 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 re: the impact of any strike action on our students, ensuring that our students studying at other institutions are not disadvantaged.

10) Disruption due to pandemic

During the summer term 2019/20 we successfully transitioned to emergency remote delivery for all course teaching and assessment in response to government COVID-19 restrictions implemented in March 2020. As the pandemic continued, we progressed the following measures in 2020/21, 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:

- Ensuring that all academic governance and governance committees' decisions prioritise the safety and wellbeing of our community.
- Initial investment of c£600k + additional budget to ensure a sustainable approach to the delivery of blended learning. The 'blend' can mean different places for learning (onsite and digital); different scheduling (synchronous and asynchronous), different pace (class and self-paced) and different types of instruction (expert led, social/group, peer and individual).
- Ensuring that the digital infrastructure for teaching and learning was robust enough to support blended learning and online assessments, including a move to the cloud to increase capacity at peak periods.
- Ensuring that students were could effectively access their learning through the Digital Support Fund that provided funding for equipment or broadband improvements. The fund distributed c£130k.
- Ensuring students had access to digital skills and time management support including workshops/webinars and 1:1 support to enable students to develop effective study habits and manage independent study time.
- Limit of on-campus learning activity to practical sessions that cannot be effectively delivered remotely.
- Provision of PPE to all students with enhanced PPE provided to students as determined by activity and/or individual risk assessment.
- Access to COVID-19 testing for students and encouragement to our community to take up vaccination when offered.
- Introduction of mask policy and COVID-19 Resilience Commitment for all staff and students to ensure understanding of the additional requirements and expected behaviours that will help to protect our community and minimise the impact of the pandemic.
- Accommodation and subsistence support for students required to self-isolate – either following travel to/within the UK from a restricted area or whilst experiencing COVID-19 symptoms

- Transition of professional student support services to remote delivery including via email, telephone and video calls as appropriate and in-person support for students with on-campus activity.
- Revision of Assessment and Award Regulations to account for changed environment and provide a “safety net” for students due to changes implemented in response to the pandemic.
- Regular monitoring and updating of our actual and forecast financial position through detailed scenario modelling of the potential impact of the pandemic on our key income streams and expenditure and, as a result, on our forecast operating performance and cash position. This work will inform the timing and quantum of any corrective measures required to ensure continuing financial sustainability. As mentioned above, the RVC currently holds healthy cash balances which offer mitigation in the short-term.
- Specific COVID-19 Risk Register to ensure all risks are captured, monitored and actions taken to mitigate these.
- Specific Coronavirus/COVID-19 Outbreak Plan detailing actions and mitigations in the event of a further Coronavirus/COVID-19 upsurge.
- Regular liaison with and report to our UK accrediting bodies (RCVS and Royal Society of Biology) to advise of necessary changes to teaching and assessment delivery, the latter receiving endorsement by those bodies.
- January 2021 review of 2020/21 educational delivery for all taught courses and research programmes which confirmed that all learning objectives could be met (with highly limited instances of delivery of these in 2021/22 where these could not entirely be met within the 2020/21 academic year).

We also reviewed our governance structures and introduced a number of COVID-19 working groups to ensure that we continually monitor and adjust measures as necessary, taking account of government guidance, OfS and QAA expectations and good practise as identified via close working with our accreditors and advisory networks. We continue to utilise existing governance structures and formal committees (with additional virtual meetings or agreement by correspondence) to provide final scrutiny prior to approval and implementation. This includes additional meetings of our governing body (e.g. RVC Council and Finance and General Purposes Committee) to ensure that they are fully briefed re: pandemic risks and our mitigating actions. The majority of these working groups have student representation; all formal committees have student representation.

For 2021/22, we intend to return to onsite, face-to-face teaching for all cohorts where this was the primary mode of educational delivery prior to the pandemic but the above measures remain available to us should the progress of the pandemic dictate. The proportions of onsite and digital delivery may vary according to COVID-19 restrictions in place at the time of delivery, or as dictated by RVC risk assessments associated with specific learning activities. Additionally, student support services will be available both digitally and onsite in-person to ensure maximum accessibility and the RVC will continue with twice-weekly lateral flow testing of students until the winter break as a minimum.

11) 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 the vast majority of cyber threats presented and are able to use the IT services as intended, in pursuit of their studies. The latest measure introduced in this area is a Security Information and Event Management (SIEM) system that automates analysis of network traffic to provide an improved early warning system.

In line with advice from the National Cyber Security Centre (NCSC), to defend against the latest generation of cyber security threats we are prioritising 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 in summer 2021, 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.

In revising IT infrastructure and Software as a Service (SaaS) applications to accommodate the greater need for delivery of remote working, study and teaching solutions we have strengthened the robustness of existing solutions for remote desktop (RDWeb) and virtual private network (VPN) access. In order 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 provided.

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 of students to protect their own data and devices.

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

The Student Fees Policy 2021/22 covers the following:

- refunds for students in receipt of tuitions fee loan from the Student Loans Company;
- refunds for students who pay their own tuition fees (self-payers); and
- refunds for students whose tuition fees are paid by a sponsor.

The Policy also covers remedial arrangements 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; and
- 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 significant cash reserves (£48m at 31 July 2021) which would be sufficient 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 implication of 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 College.
- 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 be 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 student protection plan, 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.