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

The risk of institutional failure is very low. The risk of institutional failure is monitored in accordance with all higher education regulatory body requirements and any likelihood of this would be identified and carefully managed through the University’s risk management procedures. The Richmond Foundation has noted a resolution committing it to supporting the University’s Student Protection Plan in the event of delivering the financial implications of the Plan and the University’s Refund and Compensation policy. We will undertake equality impact assessments to assess the effect on students with different needs, characteristics and circumstances.

There is very low to low risk that the University will no longer run components of a degree programme. We may revise degrees and delete modules (courses) on the basis of feedback and to ensure quality while ensuring that QAA Subject Benchmark Statements are always met. The risk of deleting required modules (courses) is very low because this is normally done at the point of programme revalidation every 5 years. The risk of deleting or revising optional modules is moderate because there is more flexibility of choice for students and low demand may lead to the removal of an optional module.

The risk that the University will no longer deliver modules (courses) at our additional locations in Italy is low. The additional sites in Italy are primarily for study abroad students who enrol temporarily at the centres, and no modules are required for Richmond degree courses. Richmond degree-course students can only complete up to one semester at either site and are advised on course choice before departure.

The risk that the University discontinues the RIASA programme in Leeds is very low because of its successful enrolment and profitability. The University has approved the BA International Sports Management degree to be offered in London and coaching and sporting facilities will be available for this, and should a decision be taken to close operations at Leeds we will assist students in relocating to London.

The risk that the University will discontinue a degree programme is low because degrees are reviewed annually for viability, subject to a 5-year check on academic quality and financial viability, and our core curriculum model significantly reduces direct degree programme costs by offering economies of scope with other programmes through extensive course sharing.

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

In the unlikely event that the University is no longer able to operate as a University as a whole, we will follow the process outlined in the “Middle States Commission on Higher Education: Merging or Closing a Postsecondary Institution or Program Site”.

In the unlikely event that Richmond must cease operating, we would consider measures to protect the student experience, such as:
• where possible, closing in a gradual way, over a period that would allow a student to complete studies at the University;
• where the above is not possible, support transfer to an appropriate programme at another provider and, where appropriate, by compensating the student who may suffer demonstrable, material financial loss because of disruption to studies;
• merging with another institution to maintain all or part of the University’s current provision.

If there is significant disruption to Richmond activity (e.g. the closure of a degree programme) the actions the University will take to minimise disruption may include:
• temporary short-term suspension of programme delivery (e.g. where there is a change in the programme delivery location or staffing, with appropriate actions to mitigate the impact);
• changes to the delivery location or method, which may include some distance learning;
• changes to the staffing of a programme, including the recruitment of alternative staff, where appropriate;
• offering the opportunity to transfer to an alternative Richmond programme;
• providing reasonable support to access a programme run by another provider, including liaising with other providers concerning credit transfer and transcript delivery.

The University’s Business Continuity Plan covers other mitigating actions affecting business continuity, such as acts of terrorism, damage to buildings or equipment.

If the University is unable to continue offering a specific degree programme, we will follow the ‘Discontinuation of a Programme’ procedures outlined in the Quality Manual and establish a ‘Teach-Out Plan’. We will cease marketing, stop the intake, inform any prospective students in sufficient time so that their opportunities are not jeopardised, inform all enrolled students, and teach out the programme in a similar manner as if the programme was not being closed. The University will ensure that students are not disadvantaged by offering individualised attention to progression and graduation, offering all required courses or academically sound substitutions until graduation, and assisting with transfers within or out of the University if desired. If the programme teaching-out plan suggests an accelerated timetable, where students are expected to attend additionally-scheduled classes in summer sessions, the University will consider special arrangements regarding fees. Students who have withdrawn from the University (officially or unofficially) will not normally be permitted to re-enrol to the University onto the programme during the discontinuation process. Students on an official Leave of Absence will be kept informed and will be treated in the same way as enrolled students.

Should it not be possible to teach out, we will consider whether there are options to change programmes at the University or to transfer to complete the programme at another institution. We will undertake equality impact assessments to assess the effect on students with different needs, characteristics and circumstances.

If a prospective student has applied for a Richmond programme, but have not yet enrolled, they will be notified (in accordance with UCAS deadlines where appropriate) in time for them to source an alternative suitable programme, where relevant, at The University. We will provide the student with support and advice in these circumstances.

If a programme loses its accreditation from a Professional, Statutory or Regulatory Body (PRSB), the University will consider measures to protect the student, such as:
• offering the chance to move to another programme;
• delivering a modified version of the same programme;
• providing assistance to switch to a different provider who has the relevant accreditation

If the University is unable to deliver modules in Italy, we will stop the termly intake immediately, remove the option from all documentation and marketing material, inform all students, and teach out the remaining year in the same manner as if the location was not being closed. This will not impact upon degree-course Richmond students, as study at the additional locations is optional.
If the University is unable to continue offering a specified degree programme, in London or in Leeds, we will follow the ‘Discontinuation of a Programme’ procedures outlined in the Quality Manual and establish a ‘Teach-Out Plan’. We will cease marketing, stop the intake, inform the prospective students in enough time so that their opportunities are not jeopardised, inform all of the existing students, and teach out the programme in a similar manner as if the programme was not being closed.

The University will ensure that the students are not disadvantaged by offering individualised attention to progression and graduation, all required modules or academically sound substitutions until graduation, and assist with transfers within or out of the University if desired. If the programme teaching-out plan suggests an accelerated timetable, where students are expected to attend additionally-scheduled classes in summer sessions, the University will consider special arrangements regarding fees. Students who have withdrawn from the University (officially or unofficially) will not normally be permitted to readmit to the University onto the programme during the discontinuation process.

If the University is unable to deliver a specified module, we will offer a reasonable substitution in its place.

If the University’s Tier 4 Sponsor status is suspended, we will take all reasonable steps to minimise disruption to students by, for example:

• working with UKVI to allow a student to complete the year of study or programme;
• allowing the student to enrol and commence studies, if already in receipt of a visa based upon an allocated CAS from Richmond;
• offering the student the opportunity to postpone application pending the resolution of the suspension

If the University’s Tier 4 Sponsor status is revoked, we will take all reasonable steps to minimise disruption to the student by, for example, assisting the student to switch to an alternative sponsor.

Should the university lose degree awarding powers we will work with the OfS to:

• ensure all reasonable steps are taken to minimise the resultant disruption to students;
• ensure that, as far as possible, changes are made in a transitional manner.

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

Richmond The American International University in London Compensation and Refund Policy 2018/19

This policy should be read in conjunction with our regulations, policies and procedures and the Student Protection Plan (“Plan”). In the event of any conflict between this policy and the regulations, policies and procedures and/or Plan then the regulations, policies and procedures shall take priority, then the Plan and then this policy.

This policy applies if you are a student studying with Richmond, The American International University in London (“Richmond”) on one of its campuses in England or Italy.

We will review this policy at least annually and update and amend as required. We also reserve the right to amend this policy from time to time based on legal or regulatory change affecting you or us or best practice in the higher education sector.
For the avoidance of doubt you are not able to obtain redress under both the Plan and this policy; in some instances, you might be given a choice between accepting redress under either the Plan or this policy in which case you will be able to opt to accept redress under only one of the Plan or this policy but not both.

Our regulations, policies and procedures explain that, in exceptional circumstances, it may be necessary for Richmond to revise the content or delivery of programmes or discontinue or suspend programmes, often in circumstances outside our control. Whilst it is unlikely occasionally the delivery or administration of programmes or modules may not meet the high standards we expect.

It is possible we may also cancel a programme before it starts when we judge that it will not be viable for academic, regulatory, legal, commercial, financial or other reasons. This policy would only apply in those circumstances if you have applied for a place on the course we have had to cancel and you have accepted an offer to study on that course with Richmond.

These instances are very rare: we work hard to anticipate any changes to our provision so as to minimise disruption to you and to enable you to complete your studies as intended. We explain how we will do this in our Student Protection Plan. However, after exploring all possible options, there may be occasions where it is not possible for us to preserve the continuation of your study or, even if your study can continue it will be significantly disrupted.

In these cases, you may be eligible for a refund of fees and other payments made to the University, in full or in part, and/or compensation for other losses you have incurred.

Richmond does not accept any liability for any consequential or other economic loss (including loss of profits, loss of goodwill or loss of opportunity) resulting from any of the matters covered by this policy. Only foreseeable loss will be covered by Richmond.

Sometimes Richmond will make proposals for refund or compensation to you when any of the matters mentioned above arise. If Richmond does not make proposals or you do not consider the proposals for refund or compensation to be acceptable then you should use the University’s Student Complaints Procedure. This policy will be considered by Richmond in relation to any complaint it receives.

This policy does not cover instances where you may be considering withdrawing from or interrupting your studies for personal reasons. If you are thinking about this, please get in contact with your programme leader and seek advice - just talking to someone may be enough to put you back on track. Students choose to interrupt study or withdraw for a variety of reasons and we may be able to help.

If you decide that you don’t want to continue with your studies in this academic year, it is important that you correctly withdraw or interrupt study as there are academic and financial implications that you need to consider. For international students there will also be implications with regard to your visa.

Compensation and Refund considerations
We will consider eligibility for refund and/or compensation on a case by case basis and will take into account factors including (but not limited to):

- the scale and impact of the matters affecting you;
- travel or accommodation costs (e.g. where you are having to relocate because Richmond has to move your programme to an alternative location or you have to transfer to another provider);
- maintenance costs (e.g. childcare if student contact sessions have to be delivered at times outside the normal Richmond teaching day/week);
- what mitigation have we put in place that you may or may not have taken advantage of – including the provisions set out in the Student Protection Plan;
- how much of your programme you have completed;
- what is reasonable in all of the circumstances.

Eligibility for refund and/or compensation, and the amounts to be awarded, will be considered by the Director of Finance. In some cases, we will establish set rates for compensation of accommodation or travel costs, which will be applied automatically to all affected students. We will explain clearly how we
have calculated these set rates. In other cases, we may ask you to provide evidence of costs which you have incurred for which you are seeking compensation. You will be advised about what will happen and what you will need to do at the appropriate time.

If you are unhappy with the action Richmond has taken to deal with issues of refund and compensation and in particular disruption to or cessation of your study, then you may use Richmond’s Student Complaints Procedure to raise your concerns. Richmond hopes the above procedure will satisfactorily resolve your problem. Very occasionally this may not be the case; in this instance, you are able to ask the Office of the Independent Adjudicator for Higher Education (OIA) to review your complaint and the way in which it has been handled by Richmond. You can only refer your complaint to the OIA when you have exhausted Richmond’s complaints procedure.

The Richmond Foundation has noted a resolution committed it to supporting the University’s Student Protection Plan in the event of delivering the financial implications of the University’s Refund and Compensation policy.

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

We will publicise our student protection plan to current and future students by providing it on the university website and by making it available at appropriate student forums.

We will ensure that staff are aware of the implications of our student protection plan when they propose course or programme by ensuring the policies and procedures included in the Quality Manual are followed and that the Curriculum Development Committee and the Academic Board make decisions in accordance with University policy.

We will review our student protection plan annually and engage students in its review via the University’s committee structure and offer it for comment and input to the Student Government and via relevant committees including the Student Experience Committee, the Academic Board and the University Board.

We will inform our students if there are to be material changes to their course by in accordance with the requirements laid out in the Quality Manual, which includes engaging students in decision-making related to programme change and development.

We will give normally students one semester notice when we need to make material changes to their course.

We will put in arrangements to ensure that our students have access to independent advice if we need to implement the measures in our student protection plan.