

Student Protection Plan
Provider's name: SP JAIN LONDON SCHOOL OF MANAGEMENT (SPJ UK)
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Student protection plan for the period 2024 onwards

INTRODUCTION

This Student Protection Plan (the 'Plan') describes what SP Jain London School of Management Ltd (SPJ UK) ('the School', 'we' or 'us') will do to protect students' interests in the event of the School making a material change to a programme or programmes or having to stop providing higher education. Its purpose is to make students and prospective students aware of the range of potential risks to the continuation of their studies, how those risks may differ based on individual students' needs, characteristics and circumstances, and our view of the likelihood that those risks will crystallise. It also outlines what measures the School has taken to mitigate risks and what it would do to safeguard students' interests in the event of the School having to make a material change to a programme or programmes.

This Plan should be read in conjunction with the School's Programme Discontinuation and Teach Out Policy and Refund and Compensation Policy.

WHAT IS A MATERIAL CHANGE?

Material changes may include (but are not necessarily limited to):

- the closure of the School due to business failure
- the closure of our campus
- the suspension or discontinuation of one or more programmes
- a major change to a programme
- loss of registration with the OfS
- loss of permission to recruit international students
- external disruption to programme delivery
- loss of degree awarding powers

BACKGROUND

The School is a subsidiary of S P Jain Education FZ LLC (S P Jain), which has been operating since 2004 as the SP Jain Global School of Management (SPJG) and has campuses in Dubai, Mumbai, Singapore and Sydney. The success and reputation of our parent company's operations have led SPJG to be recognised in by Australia's regulatory body – the Tertiary Education Quality and Standards Agency (TEQSA) and re-registered for 2nd time in 2020 by them for the longest term of 7 years without conditions. SPJG is well reputed for its multi-country model that has led to great employment outcomes and a key factor, why the flagship Global MBA has been ranked highly within the top 100 MBAs by top publications like Forbes, The Economist and Wall Street Journal. Over the years, SPJG has built significant reserves without any debt and has provided a financial guarantee the SPJ UK.

SPJG is a respected higher education brand. It has established this reputation while maintaining the necessary quality standards required under the Higher Education Standards Framework (HESF); and have implemented a range of mechanisms to ensure consumer protections for international students protected under the Education Services for Overseas Students (ESOS) Act 2000. It has operated for more than a decade in the regulated Australian system and all the international campuses adhere to strict regulatory and quality standards.

SPJG's financial records show that the School is in a sound monetary position. As per the annual Provider Risk Assessment Reports issued by TEQSA in the year 2020, SPJG has been rated "low risk" on the two aggregate ratings – risk to students and risk to financial position. These ratings confirm that S P Jain is a financially secure business, with no debt and sizeable reserves. Moreover, the financial performance of the institution is be monitored continuously, and the annual accounts will be externally audited.

The School has in place a legally binding commitment from the parent company to ensure the London entity is financially sustainable, and to meet any costs associated with market withdrawal.

In this context, the School will manage its operations according to the highest standards of corporate and academic governance. We have a formal Risk Management policy and Business Continuity plan designed to manage, mitigate and, if necessary, respond to the risks identified in this Plan. Responsibility for monitoring these risks will reside with an Audit and Risk Committee, which will report directly to the Board of Directors.

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

In this section we identify the range of risks to the continuation of our students' studies, the severity or impact of those risks to our students and our view of the likelihood of these risks crystallising. We describe what we would do to protect students' interests in the event of these risks crystallising in the next section.

1.1 School closure

We think that the most likely cause of the School having to cease operations completely during the first few years of operations as being a failure to attract and recruit enough students to maintain our financial viability. The impact of closure would be **very high** on all students, but we regard the likelihood of it happening as **very low** as many of the entrants will be existing SP Jain students transferring from other campuses overseas. We know there is strong interest in the London campus in the markets we serve; therefore, we took the decision to establish a London campus in the first place. Moreover, the School has the support of a large and well-established global organisation which is prepared to sustain us through any short-term financial pressures.

1.2 Campus closure

There are several scenarios in which we may have to close our campus, including a fault with the campus itself (for example, caused by flooding) or an extrinsic event such as a resurgence of the Covid pandemic.

We regard the likelihood of our having to close the campus due to issues with the campus itself as **low** because our landlords are legally responsible for undertaking regular safety audits, maintenance and testing of systems to ensure the building remains fit for purpose.

The impact on students of campus closure depends on the length of the closure. For short-term closures (perhaps one or two days), the impact will be **low** because we will be able to reschedule the timetabled teaching sessions and other activities that would have taken place on those days.

Should the campus have to be closed for longer, we would move the delivery and assessment of our programmes to our digital platforms, allowing students to continue with their studies without having to attend the campus in person. Thus, the impact on students of an indefinite closure would also be **low**.

Further, there will be no changes to the curriculum, style of teaching and assessments. Our facilities for technology will ensure that the classes will proceed as per the schedule and all our staff including the student support staff are well trained to handle any issues/concerns that may arise as a result.

Should the campus have to be closed for a long period owing to a problem with the campus itself, then our landlords would be obliged to offer us suitable comparable accommodation nearby. Given that the programmes we will deliver will not require any specialist equipment or accommodation, this should be relatively easy for our landlords to arrange. Additionally, we could seek to provide our students with the ability to study at the SPJ Global School on different international campuses if required.

1.3 Programme discontinuation

The most likely scenario in which we may have to consider discontinuing a programme in the first few years of operations is if it fails to recruit enough students to become or remain financially viable.

We acknowledge this would have a high impact on the students enrolled on the programmes affected, but we regard the likelihood of it happening as low because based on our strong brand, historical data and a differentiated offering which is outlined in detail in our business plan Section 3 (Business Case). In this section we have outlined our strategies and existing infrastructure for attracting local and international students. Moreover, as part of our annual planning process, we will review the performance and sustainability of all programmes so that we can be confident about their future viability.

1.4 Loss of degree-awarding powers

The School has been granted its own degree-awarding powers through the New Degree Awarding Powers (NDAPs) route under probation until July 2026. During the probationary period, we will develop our resources and capabilities to the point where we meet the degree-awarding powers criteria in full. Our progress during, and at the end of, probation will be assessed by the OfS; unsatisfactory progress could lead to our degree-awarding powers being withdrawn.

Should we not be successful during or at the end of the probation period, for example due to concerns about the quality of our programmes, our students would be unable to complete their studies and achieve a UK higher education award. The impact of this on all our students would be **very high**, but we think the likelihood of it happening is **very low** because we have formulated a comprehensive NDAPs plan judged as credible and realistic for us to acquire NDAPs. Throughout probation the implementation of that plan will be closely monitored internally and subject to frequent and regular external review. Should any issues arise during the probation period, the School would be given opportunity to rectify the issue under the OfS monitoring.

We will maintain the highest standards of corporate and academic governance and quality assurance to safeguard academic standards and the quality of students' learning experiences. The efficacy of these systems has been tested by the Office for Students (OfS) before our new programmes commenced.

1.5 Major change to a programme

We consider that disruption from major changes is **low** as students will have the protection of the School's programme change procedures which requires careful consideration of impact on, and consultation with, students.

The School's general practice is that any such changes to the programme should be carried out to apply to the next admitted cohort of students. In the event that in-year changes are required, the School has a policy which requires careful consideration of the impact of the changes, and evidence of engagement with the affected students as well as the approval from the Academic Board, which will consider whether the proposed changes are reasonable and have given due consideration to the best interests of the affected student cohort. It is possible that changes to modules might occur during a student's course of study, however the School will ensure that such changes will not lead to a discontinuation of a student's study. Where through consultation, any impact is considered by students to be beneficial, then we will seek to accelerate implementation for current students, whilst meeting quality standards.

1.6 Loss of registration with the OfS

Without securing and maintaining registration with the OfS we would not be able to offer our programmes or hold a UKVI sponsor licence. Therefore, losing our registration with the OfS would have a **very high** impact on all our students, and particularly those domiciled in the UK. However, we regard the likelihood of our losing our registration as **low** because we will have named senior staff and robust corporate and academic governance systems dedicated to meeting all the OfS's conditions of registration.

1.7 Loss of permission to recruit international students

Since we plan for approximately two thirds of our students to come from overseas and require a student visa, it is crucial for our whole operation that we obtain and maintain permission from the Home Office to recruit overseas students. Thus, the impact of losing our permission to sponsor overseas students would be **very high** for all our students. However, we regard the likelihood of our losing permission as low because we will have named senior staff and robust corporate and academic governance systems dedicated to meeting all the UKVI's requirements as well as advice from leading immigration lawyers.

There is also the risk of sector-wide disruption or suspension to the recruitment of students from specific countries or regions owing to UK government's concerns about applicants from these countries. We acknowledge that the impact of such disruptions on students from the countries would be high, although there is little that the School would be able to do about it. However, this would not have an impact on the School as a whole because we aim to recruit students from a broad range of different countries, meaning that an interruption to recruitment from one country would not jeopardise the viability of our programmes.

1.8 External disruption to programme delivery

External disruption to programmes may take a variety of forms. We regard the most likely sources of external disruption as:

- industrial action or terrorist incidents affecting the public transport networks many of our students are likely to use to reach our campus
- a prolonged outage of the IT platforms our students will depend on

How much impact such external disruption will have for our students depends on its longevity, with the impact increasing the longer the disruption goes on. We regard the likelihood of external disruption due to industrial action or terrorism as **medium** due to the location of our campus in London. We regard the likelihood of a prolonged IT outage as **low** because the systems we will use are all third party, cloud-based

platforms that work independently of one another. All have a good track record for reliability. In addition, we will undertake regular reviews and penetration testing to ensure that systems are not vulnerable to cyber-attack. We will also monitor cybersecurity through our institutional risk monitoring framework, and this will remain a priority to minimise the risk to the security of students' personal data, access to emails and software systems.

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

In this section we describe the measure we will put in place to safeguard students' interests should the risks we have identified in the first section crystallise. Any consideration of refunding or compensating students mentioned in this section would be done in accordance with the School's Refund and Compensation Policy.

2.1 School closure

We have already explained that we regard the likelihood of the School having to close owing to business failure as very low. However, should the School find itself in a position where we have no option other than to close, we would consider the following measures to protect students' interests:

- where possible, the primary objective would be closing in a phased manner to allow current students to complete their studies with us
- in a situation where this is not possible, we would support students to transfer to an equivalent programme at another provider, and consider compensating students if, because of the change of location of their studies, they suffer demonstrable and material financial loss
- alternatively, we may explore the possibility of merging with another provider to maintain all or part of the current provision.

2.2 Campus closure

If part or all of our campus is rendered unusable for activities involving students, we would consider remedies including:

- relocating provision to an alternative location identified by our landlord
- rescheduling the timetabled hours to allow all the scheduled teaching to take part in the available facilities. This may include student contact sessions being held outside of usual planned hours. Where such an approach is taken, the students affected will be consulted first.
- delivering part or all of programmes through alternative means. Where such an approach is taken, we will consider whether this is appropriate for students who would be affected.

In the event that a student was unable to move their studies to an alternative location, or engage with alternative modes of study, we will consider compensating students if they suffer demonstrable and material financial loss.

2.3 Programme discontinuation

The School's Discontinuation and Teach Out Policy would protect students' interests by requiring the formulation and implementation of a comprehensive teach-out plan.

In the event of individual students not wanting to complete their programme of study at the School during any teach-out period, or the School having to discontinue the programme before teach-out was complete,

we would employ other measures outlined above to facilitate student transfer to other providers to complete their studies and consider compensating students who suffered demonstrable and material financial loss.

2.4 Loss of New Degree Awarding Powers

The likelihood of this happening is low because we have formulated a comprehensive NDAPs plan which has been judged credible and realistic by QAA for us to acquire NDAPs in the first place. Throughout the probation the implementation of the plan is being closely monitored internally and subject to frequent and regular external review by the OfS. A summary of the plan against the five sections of the DAPs criteria is given below in Appendix 1. However, in the event of this happening, the School will consider measures to protect students' interest, such as:

- working with another institution to be an awarding body to ensure students could complete their programmes prior to the relationship coming to an end
- helping affected students transfer to an alternative programme
- working with SPJ Global to transfer students to their programmes

2.5 Major change to a programme

In the unlikely event of major in-year changes to programme content we will ensure that:

- any changes are restricted to the minimum necessary to achieve the required academic outcomes and quality of student experience
- affected students are notified and consulted with in a timely manner
- we work with students to ensure that any revised offer is still acceptable
- where necessary, the School would allow students the opportunity to withdraw from the programme
- if required, students would be offered every reasonable support to transfer to another programme, or provider

In the event that any student finds the revised offer unacceptable or were they not able to move their studies to an alternative location, or engage with alternative modes of study, we would consider compensating students suffering demonstrable and material financial loss.

2.6 Loss of registration with the OfS

In the unlikely event of deregistration, we would take all reasonable steps to minimise the resulting disruption to students by, for example:

- working with the OfS to allow enrolled students to complete their programmes
- where this is not possible, supporting students to transfer to similar programmes at other providers and, if appropriate, compensating students where they suffer demonstrable and material financial loss because of the transfer and/or due to disruption to their studies
- supporting students by providing any evidence required to facilitate the continuation of their studies with another provider
- exploring the possibility of merging with another provider to maintain all or part of the current provision

If some students were not able to move their studies to an alternative provider, the School would consider compensating students suffering demonstrable and material financial loss.

2.7 Loss of permission to recruit international students

In the unlikely event of our losing our permission to recruit or sponsor overseas students, we would take reasonable steps to minimise the resulting disruption to students by, for example:

- Working with UKVI to allow any registered students to complete their year of study/programme (in the case of suspension)
- Allowing any students who have obtained a VISA based upon an allocated CAS from SP Jain to enrol and commence their studies (in the case of suspension)
- Offering the students who have not yet travelled, the opportunity to postpone the application pending the resolution of the suspension
- In case of a revocation, SP Jain will provide assistance for the affected students to switch to an alternative sponsor.

2.8 External disruption to programme delivery

In the event of a major and prolonged disruption to public transport networks near our campus, we would protect students' interests by ensuring that normal operations and services are maintained as far as possible. This may also include taking actions outlined for campus closure above. If the external event may be traumatic for students, we would offer through our student wellbeing services one-to-one support internally or referral for external support.

3. Information about the policy you have in place to refund tuition fees and other relevant costs to your students and to provide compensation where necessary in the event that you are no longer able to preserve continuation of study

Our Refund and Compensation Policy describes the circumstances under which we will provide refunds and compensation to applicants and students. It also provides clear rules about the value of refunds depending on when and in what circumstances students withdraw or are withdrawn from their programmes.

The School will refund all fees paid by commencing students including compulsory tuition, administration, and registration fees in the unlikely event that the School is unable to continue the delivery of the course, as set out in the signed letter of offer.

We may offer the student a place in an equivalent course (if applicable) with fees not in excess of the original course and no other extra administrative fees will be applied by the School.

As part of a risk-based management approach, the School will hold working cash reserves which will be considered sufficient to provide refunds and compensation for those students who might be at risk in relation to non-continuation of a particular programme. Our student compensation and refunds will be based on the Office of the Independent Adjudicator's (OIA) indicative compensations bands for distress and inconvenience wherever applicable.

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

Our student protection plan will be published on our website and in the undergraduate and postgraduate prospectus.

4.1 Communication with Applicants

We will provide prospective students with information on the website about the courses on offer, how to apply, accommodation, fees and what it is like to be a student at the school. The Student Protection Plan will be linked in our Terms and Conditions at the application stage.

4.2 Communicating with our Registered Students

The Student Protection Plan will be communicated to registered students through a number of student communication channels that include the website, e-newsletters, topical and designated emails and/or social media channels.

4.3 Communicating with our Staff

We will ensure that staff are aware of the implications of our Student Protection Plan when they propose course changes, by providing training to relevant staff.

5 Review of Student Protection Plan:

We will review our Student Protection Plan regularly through our main governing committees. Information will be passed on to the students in case of the following:

- Major/minor modifications to courses or programmes: We might choose to make changes to a course/programme. This could be due to some feedback from an external examiner that it needs to be refreshed to make it more up to date. We might also decide to update based on student feedback or outcomes on the course/programme. We will include students in the conversation about what we want to update before this happens. The process for making changes is considered with our Academic Board, both before and after the change is made.
- We will also review proposed revisions to the Student Protection Plan with the Students' Council. We will undertake this annually through the Students' Council. We will also consult our students as part of other engagement sessions.
- Students are also notified of any other changes to the Student Protection Plan itself.
- We are committed to communicating changes to students as early as possible, with clear information and options. We will include student consultation and representation in our decision making.
- Once a change has been approved, students will be informed at the earliest opportunity by the staff, directly through email communications, FAQ pages where appropriate, and students will be invited to attend one-to-one and group meetings with the Head of the programme to discuss their views so that we can take them into account.
- In case if we are making significant changes to the programme, we will provide initial communication as described above. The communication will include an explanation of the proposed changes, details of the implementation date, how the changes will affect students and how to access further information.
- We will also ensure that students are aware of any external information, guidance, and advice such as guidance for students from our regulators like the OfS.

6 Activation of the Student Protection Plan:

If it is required to implement the procedures in our Student Protection Plan, a team would be established that comprises of members of the academic staff, senior administrative staff, and a student representative, to follow the necessary processes and associated timelines, to ensure that the student learning experience is maintained and that full consultation with students has taken place. The consultation would be designed to help students and inform them if there are to be any major/material changes to their course.

Appendix 1: NDAPs Criteria

DAPs criteria and related risks	Mitigations
<p>A: Academic Governance: the School's Academic Governance system is not fit for purpose</p>	<p>We have developed a comprehensive academic governance structure with clear and appropriate lines of accountability for the academic responsibilities we will have as a degree-awarding body. Our academic governance will be inclusive, with students and professional services staff playing their part as full members of Academic Board. Academic Board will also include external members to make sure we are taking account of independent points of expertise.</p>
<p>B: Academic standards and quality assurance: there is a failure to set and maintain standards and the quality of students' academic experience</p>	<p>We have developed transparent and comprehensive academic frameworks and regulations to govern how we set and maintain the academic standards of our awards credit and qualifications. Our Quality Assurance Framework aims to ensure that academic standards are maintained and that our students enjoy a high-quality academic experience, irrespective of their own backgrounds and characteristics, or of the way in which the programmes are delivered.</p>
<p>C: Scholarship and pedagogical effectiveness: the School's staff demonstrate insufficient scholarship and pedagogical effectiveness</p>	<p>We have adopted a comprehensive set of policies and procedures for the recruitment, induction, development and promotion of staff, which will ensure not only that the staff we recruit are suitably qualified and prepared to teach and support students but also that they engage in continuous professional development to achieve their full potential. Professional development of staff will include the requirement to reflect on feedback from students.</p>

<p>D: Environment for supporting students: the School does not have an environment fit for supporting students</p>	<p>Our policies provide for quality and strength of academic and pastoral support as well as a state-of-the-art campus and learning resources, comprehensive services for non-academic support and careers guidance and a sophisticated monitoring system to make sure we track the progress of each individual student and intervene quickly if a student is showing signs of difficulty or disengagement.</p>
<p>E: Evaluation of performance: The School does not have effective mechanisms in place to evaluate its performance</p>	<p>Our Quality Assurance Framework provides a comprehensive set of checks and balances, for all aspects of our provision, including the maintenance of academic standards and the safeguarding of students' academic experiences. A hallmark of our Framework is external benchmarking to provide evidence of the effectiveness of our operations and inform continuous improvements.</p>